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Reinventing appraisal

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In 1986 David Bearman first put the argument that core archival methods of appraisal, description, preservation and access were fundamentally unable to cope with the volumes of records archivists were required to process. He called on the archival profession to completely reinvent its core methods. Noting similar challenges for archival methods in evolving digital business environments, this paper explores how the archival method of appraisal could be reinvented.

Keywords: appraisal; archives; continuum; information; reinvention

Introduction

In 1986 David Bearman first put the argument that core archival methods of appraisal, description, preservation and access were fundamentally unable to cope with the volumes of records archivists were required to process. He called on the archival profession to completely reinvent its core methods.[1]

Noting similar challenges in evolving digital business environments led the Sydney-based discussion group, the Recordkeeping Roundtable (in partnership with the Australian Society of Archivists), to hold a two-day workshop in Sydney in November 2012. The 'Reinventing Archival Methods' workshop was attended by nearly 70 participants from across Australia and New Zealand and included students, educators, and professional records managers and archivists working in a range of government and private sector

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environments.[2] At the workshop, participants debated and explored means by which archivists can fundamentally reassess their professional methods and determine mechanisms for the creation and maintenance of stable archival records in the twenty-first century.

To continue the discussion generated at the event and in order to extend this discussion to a broader audience, at the conclusion of the workshop it was decided that members of the Recordkeeping Roundtable would lead the development of two issues papers addressing two of the key discussion topics at the workshop, the professional archival methods of access and appraisal. While the Roundtable workshop did not consciously separate the two, the methods of appraisal and access have traditionally been conceptualised separately. The 'Reinventing Appraisal' and 'Reinventing Access' articles that appear in this issue of *Archives and Manuscripts* have bowed to this separation but inevitably each paper touches on both access and appraisal issues.

Both papers also share a similar structure, based on core questions that resonated through the Reinventing Archival Methods workshop. These questions ask:

- Do the professional methods of archivists allow them to respond to the human dimension of archives?
- Can a shared conceptual understanding of core archival methods be achieved?
- How well do archival methods deal with contemporary business realities?
- How well do archival methods meet current archival requirements?

This paper explores these questions as they relate to appraisal.

Do archivists' professional methods allow them to respond to the human dimension of archives?

Before an extensive discussion of archival methods and professional practice, it is important to define appraisal. The first national standard on records management, AS 4390-1996: *Records Management* (the development of which was also inspired by the work of David Bearman), acknowledged appraisal as the core of the recordkeeping endeavour. It defined appraisal as:

> the process of evaluating business activities to determine which records need to be created and captured and how long the records need to be kept, to meet business needs, the requirements of organisational accountability and community expectations.[3]

AS 4390 codified appraisal as a proactive recordkeeping process, about record creation as much as about record disposal, requiring the assessment of business and community requirements for information at or before record creation and using these requirements to ensure the creation and maintenance of necessary records. In the AS 4390 framework, appraisal begins with questions: What is the purpose of making and keeping records? Why do people want them? What will they do with them? What will they do without them? Who else besides the formal creators needs the records and why?

At the Reinventing Archival Methods workshop, the complexities of these questions were rigorously discussed. Speakers Sue McKemmish and Tim Sherratt argued that emotion and an acknowledgement of the human dimension of archives had been lost from much professional practice. They emphasised that records are primarily about people and therefore the archival profession needs to acknowledge the human dimension of archives and to allow its professional methods to encompass this.[4] It was argued that

highlighting the human dimension and the place of emotion in archives points appraisal towards the broader, contested and complex areas it needs to address.

In the workshop, many observed that memory in the form of records is frequently contested. This is because interactions between individuals and the state are not equal, and neither are the interactions between most individuals and corporations, religious institutions or other organisations such as sporting bodies or unions. Inevitably, the records of interactions between an individual and an organisation will be created by the organisation itself and its 'official record' will form the basis of the institutional memory. Consciously or unconsciously, the actual voice of the individual will be silenced. The role of reliable, authentic, authoritative records in fixing institutional memory is widely accepted as a truism of the archival profession, yet hidden below this is a personal, emotional, human reality that could be denied or unrecognised within official institutional recordkeeping.

Acknowledging the human dimension of archives has long been an issue for many archival institutions. A specific and widespread example is the appraisal of case files in a variety of administrative settings. In traditional paper format, their large volumes dictated a standard approach which identified the policies and procedures governing the processing of cases as the long-term records, while individual case files were retained for only a limited number of years after the case was closed. If allowing for professional methods to respond to the human dimension of archives, would archivists appraise these activities in the same way today, in the context of rights of access and privacy, in the context of the ongoing struggle by Aboriginal people to contest official history, or with awareness of the centrality of case file records in aiding separated families to be reunited or to at least understand their story? Today appraisal needs the capacity to respond to these complex and often competing personal and bureaucratic realities.

In contemporary Australia, arguably the most publicly contested political issue is the response to the mass movement of peoples as refugees. Administratively, this response is controlled across a range of federal government agencies but core aspects have been outsourced to multinational organisations. It is impacted by state and federal law as well as international protocols such as UN conventions and international laws of the sea. It involves a wide variety of non-government organisations, as well as state and federal police, local hospitals, public and private medical staff, local governments, local businesses, local communities and religious organisations. The diverse incompatible, national and multinational, highly secure and/or commercial-in-confidence, politically contentious, fragmented, corporate, potentially cloud-based environments in which organisational information about refugees is created and managed, as well as multiple personal, local and informal environments, overwhelmingly compound these problems. Few areas of official administration of law and government services are more complicated, but at the centre are people whose fates are tossed around in this maelstrom, whose stories are presently hidden from view but whose individuality will be preserved in multiple forms of records. Will archivists' professional methods allow them to identify the human dimension of these archives? If appraisal frameworks can make an adequate response to this administrative complexity while identifying and respecting the human dimension of archives, then the reinvention of archival methods will be well underway.

Can a shared conceptual understanding of core archival methods be achieved?

Before such a reinvention is possible, however, there needs to be consensus around what is being undertaken. Sadly, it would appear that what was once a shared conceptual

understanding, the definition of appraisal as codified in AS 4390, has substantially fallen away in the years since the standard's inception.[5] Today appraisal is taking on different meanings, many of which are conceptually quite different from AS 4390's intentions. As the reach of that shared understanding has shrunk, fragmenting recordkeeping operations are increasingly starting to dominate across business and archival environments.

Appraisal today more often refers to the time archivists spend assessing existing records for their potential to be retained as the corpus of documentary cultural heritage, than to assessing business activities to identify recordkeeping requirements for creation, management and accountability into the future. The focus in archival institutions on older records which are more often paper than digital has lost sight of the AS 4390 concept of appraisal and reduced much of contemporary practice to authorising destruction. As discussed below, this is far removed from the digital realities and necessities of the contemporary workplace. The experience of determining the 'value' of existing records, reviewing inherited accumulations of records, or deciding on the retention or destruction of individual record items which may be 10 or more years old, is poor preparation for appraising activities and developing records requirements in the current business environment. While it is highly likely that the assessment of retention periods and identification of records of activities requiring long-term retention are correct, applying those judgements to the fragmented information frameworks of most contemporary organisations is increasingly impractical, if not actually distorted, when the focus is still often a small residue of legacy paper records.

A shared concept of appraisal will help archivists to respond systematically to the complexity of current recordkeeping environments in ways which also embrace and support complex access frameworks, but redefining this shared understanding is not yet understood as a professional priority. In 2008, Steve Bailey noted that: 'It is the fitness for purpose of our existing appraisal methodologies for the Web 2.0 world that have been examined … and, to varying degrees been found wanting.'[6] In the years since Bailey's observations, the professional and societal need for a renewed concept of appraisal has become even more urgent.

How well do archival methods deal with contemporary business realities?

In contemporary organisations, the following challenges exist, all of which specifically impact on appraisal and the ability today to create and manage meaningful business information:

- multiple professional responsibilities;
- technological complications;
- information devolution and decentralised business processes;
- commercialisation and proprietary systems;
- evolving forms of record; and,
- data volumes and risks of data storage.

Multiple professional responsibilities

Today the challenges of influencing record creation, as required by the AS 4390 understanding of appraisal, are significant. Professionally, many archivists struggle to 'get a seat at the grown ups' table'[7] to advocate for improved governance and accountability in business projects or IT systems. They have difficulties convincing others of the

significance or costs of inadequate recordkeeping both for a project's completion and for subsequent business operations. In the digital environment, recordkeeping needs to be a collaborative endeavour, a partnership between recordkeepers and business and ICT staff. In practice, however, recordkeepers are seldom identified as stakeholders and project phases where they should most critically be involved, such as assessments of business processes and definition of information requirements, are often limited as a cost-cutting measure. Appraisal is therefore scoped out of many contemporary business initiatives and few recordkeeping professionals are positioned to argue successfully for its inclusion.

Instead, today there are many professionals assuming control over what has traditionally been the responsibility of records managers and archivists. In most areas the ICT industry has broadly assumed control over areas which previously have been either management or recordkeeping responsibilities, including business specifications and information requirements definition. When information requirements are considered from ICT perspectives, however, they tend to be defined as technological issues and not as matters of governance, business risk or asset management and so core recordkeeping requirements are not considered.

The widespread use of third-party service providers for technology and service provision, or to perform business operations on an organisation's behalf, complicates these issues further. The outsourcing of business processes, and the relinquishing of the technical capacity to design and retain records which are then also held in external systems, further limit the reach of appraisal and potentially jeopardise access to business records over time. The lack of profile for recordkeepers in contemporary organisations also results in outsourcing or provisioning decisions being made without adequate planning, risk assessment or appropriate recordkeeping safeguards inserted into contractual arrangements.

As an example, information management is rarely considered as a business risk or issue requiring management in cloud-based service arrangements. The costs or limits to data portability in many cloud environments, or the routine deployment of standard data purge conditions in these services, can significantly impact on appraisal objectives and business information needs, but these risks are seldom factored into management's decision-making processes. In social media environments, business activity occurring here is seldom referred to records and information management staff for assessment and, as a consequence, the proactive recordkeeping actions required to manage high-value corporate information in this space are rarely initiated and necessary appraisal actions do not occur.

Technological complications

Because appraisal is not generally performed during system design and implementation, the result is often the creation of inadequate records, or records which cannot be adequately managed within a system, or records which cannot easily be exported from systems. *Post factum* appraisal in these circumstances is then also constrained by the costs and difficulties of migrating records and their metadata from legacy systems. These difficulties are such that, increasingly, legacy systems are being abandoned as the cost of migrating or maintaining them cannot be justified by continuing business use, even before the costs of ongoing licensing are included.

Appraisal is not being used to mitigate other system-related threats to business and business information. Contemporary business tools such as wikis, network environments, mobile apps or collaboration tools are commonly adopted under team or project-defined

rules and are therefore not aligned to broader information governance frameworks. Many of these business-defined tools are routinely purged or deleted at the conclusion of a project because project staff (who may also be contractors of a third-party provider) are unaware of any ongoing use requirements for the information they contain.

Information devolution and decentralised business processes

In the digital environment, records are also devolving and decentralising and appraisal methodologies are not keeping pace with these information evolutions. For example, many transactions that were once managed by forms, templates and through a central corporate file might now be performed via personal email accounts, section-based business systems and network environments, campaign-specific social media accounts and web front ends to large corporate databases. In most organisations there is little accepted central regulation of all business information, so most users are free to use their own descriptive terms, management approaches and native application environments for data storage. Consequently, there are no easy means to link all components of a transaction, nor to define through appraisal which if any of these components has long-term business value.

The broad adoption of 'bring your own device' (BYOD) strategies in business is also escalating the fragmentation of corporate information and leading to the radical diversification of recordkeeping environments. Corporate information is increasingly held in personal applications on personal devices and appraisal is making few if any inroads to safeguard or manage this business information.

Appraisal should be a tool to reconnect and manage fragmenting records of business operations. It should be the means of continuously assessing and analysing business process and context and not a static, retrospectively focused process divorced from business realities. Archivists need to develop a different approach to appraisal to provide the means of identifying business and technical evolutions and keeping the evidence needed for business activities through these evolutions without trying to impose unwelcome centralisation on an organisation, but professional practice has not yet achieved this objective.

Commercialisation and proprietary systems

Appraisal objectives are further limited because today the majority of commonly used business applications are commercial products. The commercial drivers behind these applications cause frequent product change and innovation, which in turn drives frequent data migration and reconfiguration. Some commercial products are also designed to limit interoperability with other vendors' products. These factors drive up the costs of retention of data over series of regular, scheduled software upgrades.

Elena Danielson has warned against 'the commodification of information'[8] and argues that it is a potential disaster for the identification and maintenance of long-term value digital records. She argues that the commercial incentives behind today's lack of standardisation and the increasing opportunities for information to be 'owned' can, potentially, irreparably damage the ability of organisations to access their own business information over time. Appraisal needs to be deployed as a risk management or abatement strategy in response to both the fragmentation and the complexity of the business system environment to ensure the ongoing accessibility of core information, but this is not a standard approach.

Evolving forms of record

Appraisal today is also not keeping pace with evolving forms of records. Today's business systems generate extensive metadata but, in the absence of conscious and continuing appraisal, there is little attempt to determine what metadata needs to be kept, for example, to maintain the meaning and value of records, to authenticate transactions, to initiate processes, to contextualise data, to identify and validate information, to connect business transactions across multiple systems, to enable data reuse and the deployment of 'big data' strategies, nor to leverage the ongoing utility of metadata itself as an aggregating resource over time. Systems and their management frameworks also constitute records of how organisations perform their operations, and appraisal therefore needs to embrace assessment of both metadata and systems in its scope but this perspective is still broadly missing in commonly applied professional practice.

Data volumes and risks of data storage

In addition to all that identified above, appraisal should also be the expert strategy to address and manage the current data growth rates and risks but, professionally, archivists are struggling to apply appraisal strategies in digital business environments. The risks associated with this lack of professional action are becoming extreme. To illustrate, David Rosenthal of Stanford University, in response to current trends to 'keep everything', has analysed the costs of storing all today's data in the cloud. Rosenthal concludes that 'keeping 2011's data would consume 14% of 2011's GWP [Gross World Product]'. Given the International Data Corporation's estimates that, annually, data is averaging a 57% volume increase, Rosenthal calculates that 'endowing 2018's data will consume more than the entire GWP for the year'. He summarises by saying, 'we're going to have to throw stuff away'. Rosenthal concludes that, by prevaricating and not confronting the problem and by allowing digital data volumes to grow, 'We may be in the bad situation of being unable to afford either to keep or to throw away the data we generate.'[9]

The accumulations of data which constitute personal information, now regulated by privacy legislation in most jurisdictions, pose significant risks to the organisations holding them if they fail to protect them from unauthorised access or accidental loss. Organisations such as Telstra, Target, Sony and banking corporations have been embarrassed by breaches of large quantities of personal information which ought to have been better secured or destroyed when no longer required.[10]

Archivists must leverage these risks and opportunities and demonstrate how the risks inherent in poorly managed data accumulations can be mitigated by appraisal based on regulatory requirements and the actual business needs of the processes generating the data. However, for all the reasons outlined above, archivists are poorly equipped to confront these issues and demonstrate their value to business.

These, then, are existing and emerging challenges across all current business environments where today's records are being created, but many legacy issues associated with traditional practice further compound these problems.

How well do archival methods meet current archival requirements?

Within business environments, then, archivists are poorly positioned to deal with the appraisal-related challenges they face but within their own institutions, archivists themselves have constructed many of the barriers now impacting their practice.

To examine why archival methods are not enabling archivists to meet their own professional requirements, this section asks:

- How is appraisal defined and understood in archival institutions?
- How has current recordkeeping become separated from archival institutions' priorities?
- Are archives engaging with a business understanding of records and recordkeeping?
- What should be done with the backlog of legacy records?
- Is digitisation a strategic response to the management of records of continuing value?

How is appraisal defined and understood in archival institutions?

As stated above, much of the appraisal practice occurring in archives today does not actively engage with digital business realities. Appraisal policies in many archival institutions still define appraisal as a process to preserve a documentary cultural heritage rather than identifying appraisal as laying the basis for practical and accountable recordkeeping, now and into the future. This institutional practice perpetuates the view that appraisal is a post-hoc process, divorced from current business environments and failing to respond to the recordkeeping difficulties outlined above. And, regardless of institutional orientation, whether toward efficient recordkeeping or the preservation of cultural heritage, archival authorities have suffered significant budget and strategic cuts in every jurisdiction, limiting the effectiveness of any strategy they seek to apply.

How has current recordkeeping become separated from archival institutions' priorities?

While most archival institutions wrestled with their paper backlog and the demand for online access to archival holdings, their engagement with current recordkeeping focused on standard-setting and supervision and approval of major disposal authorities. In organisations, the focus of records managers was the implementation of new electronic document and records management systems (EDRMS) in response to the proliferation of email and the decentralisation of business operations. The development of other business applications beyond the reach of the EDRMS was in the hands of ICT sections with the ear of top management and the budgets to give them authority. The gap between the reach of the EDRMS and other core applications and the difficulties of implementing disposal authorities (in spite of the investment of corporate time and energy in them) did not enhance the standing of records managers or the authority of the archival institutions.

At the same time, archival institutions encountered competition from other institutions or commercial entities in providing access to historical information. The effect was to concentrate their inward focus on existing holdings and digitisation as the means of improving access for users. The response of many institutions to the impact of budget cuts was to emphasise the cultural heritage aspect of archives at the expense of intervention in current recordkeeping. The by-product of this reorientation of archival institutions was the downgrading of engagement with issues and developments in contemporary business environments, leaving archivists professionally unprepared to deal with all the contemporary business-related challenges outlined above.

Are archives engaging with a business understanding of records and recordkeeping?

Recordkeeping, such as it is in contemporary organisations, is decentralised and poorly understood in relation to the priorities of business. In many organisations, the term 'records' itself is understood to mean paper, not any form of digital content. Record-keeping is understood as an administrative and compliance-based process, not as a mechanism for providing business value, nor as a process to support strategic or risk-based objectives.

Senior staff and chief executives are broadly unaware of the risks their organisations are facing through decentralised and irregular recordkeeping. There is also no sense of the long term in most organisations. Systems, budgets, executive teams, projects and business strategies tend to operate only for periods of three to five years before ceasing or changing fundamentally. The need for access to information beyond these timeframes is not widely understood and in many organisations backup tapes are regarded as a principal mechanism for meeting business risks or meeting longer term information access needs.

Archival institutions need to urgently develop strong relationships with the executive management of these various business environments to respond to these challenges, but strategic relationships of this type are not widely developed or fostered and poor understandings of recordkeeping are instead generally allowed to proliferate.

What should be done with the backlog of legacy records?

In the majority of organisations there are extensive backlogs of paper records. These often lack adequate control and description and have not been assessed against appraisal criteria to determine whether they can be destroyed or if they require continuing retention. Annually, the volume of these legacy records costs tens or hundreds of thousands of dollars in in-house accommodation or commercial storage arrangements. These tangible costs mean that dealing with backlogs has dominated appraisal processes and obscured a failure to engage with contemporary recordkeeping issues.

Paper legacies however will soon be dwarfed by poorly managed digital legacy data and systems. These urgently need a risk-managed, proactive appraisal approach to identify and retain core information and allow the remaining data to be destroyed. These approaches then should also be applied to the paper legacy volumes, but such strategic approaches are rare. Before long, however, with decreasing budgets and increasing data volumes, archival institutions will be held to account for what will be perceived to be their bureaucratic approach to legacy information management. Archival institutions urgently need a legacy management strategy. This will likely be a compromise approach from the perspective of traditional archival requirements, but it is critical in terms of obtaining more strategic outcomes.

Is digitisation a strategic response to the management of records of continuing value?

Archival institutions today operate under difficult financial circumstances. Paper holdings are degrading and require extensive preservation operations, while digital archiving operations are non-existent or poorly funded.

In a previous era, microfilming was seen as the answer to the increasing costs of storage of paper. Today digitisation is seen as the answer both to the costs of storage

and to improving access to archives for the public. But archivists must be circumspect in their response to this apparent answer to their problems. The strategic difficulties of deciding what should be digitised reproduces the dilemmas of the past but is compounded by the popularity of online access. Archival institutions cannot ignore this broad audience in favour of the preservation of what they or significant users regard as the most important records. Digitisation requires laborious preparation and even more careful metadata management than paper-based records. Determining what records to prioritise for digitisation is, in itself, an appraisal decision but the matter of selecting records for digitisation seems to have become detached from the appraisal which first identified the records for continuing retention.

Returning to the example raised at the beginning of this paper, appraisal of the multi-jurisdictional, multilayered activity of responding to asylum seekers, what should archivists do to ensure the voices of the other side of government and organisational activity are included in archival consideration and are preserved beyond standard custodial arrangements? Archivists need to explore the way all stakeholders in such contested fields of action can be included and can exercise control over their own part in the story. Adopting a risk management approach to appraisal of business activities should not mean avoiding accountability but should address the matter of protecting the rights of all parties. If an activity such as dealing with asylum seekers is seen only through the eyes of the principal government agency and in terms of a custodial response, then an impossibly distorted view will be preserved. With appraisal in these complex environments, archivists must think beyond the four walls of the government institutions and consider crowd-sourcing as one possible alternative strategy. Appraisal cannot stop with the identification of the records of continuing value. But it is clear from the difficulties under which archival institutions currently labour that the cost and means of sustaining access is part of the exercise. And on this issue, are archivists perhaps asking the wrong questions? Should they be thinking about providing access to records in different ways? Custody and control are not the only answers to the preservation of archives. Other records which have long-term use, such as registers of births, deaths and marriages, passport registers, electoral rolls or land use records dealing with water management or toxic waste, have never been in archival custody. What can archivists learn from such examples about how to reinvent and reinvigorate their practice, engaging with others and thinking very broadly and strategically about possible pathways forward?

Defining solutions

This paper has explored some of the complexities under which appraisal currently labours and identified specific issues of concern. This section proposes some possible pathways that could be further explored in order to reinvent appraisal and protect and effectively manage contemporary information.

Recognise and immediately engage with archives of emotion and community concern

Possible solutions for appraisal start with community engagement. What long-term functions with critical community requirements are moving to high-risk environments? Engagement with key organisations, such as those providing community services, support for Aboriginal communities or children in detention, looms large because of the

Royal Commission into Institutional Responses to Child Sexual Abuse. No area links the twin recordkeeping issues of appraisal and access management so completely. But there are other equally contested areas of activity where communities are at odds with government or organisations, and have long-term interests in adequate recordkeeping to call corporations to account, such as management of coal and coal seam gas extraction, urban planning, environmental protection, protection of water supplies and responses to identified dangers of climate change. Research projects within these areas could provide immediate and focused action areas and specific priorities for the reinvention of archival methods.

Do not retreat to the past

This paper suggests recovering original Australian concepts of appraisal to provide a systematic approach to the complexities of current recordkeeping practices and access regimes. While this is a start, it is doubtful that resurrecting the 1990s framework is enough. Many developments in the past two decades require expansion of this framework and a new demonstration of the utility of appraisal as a tool of analysis, risk management and compliance applied repeatedly, if not continuously, over multiple environments which require recordkeeping actions.

In re-examining AS 4390's original concepts, it becomes clear that the concept of stakeholders or community interests explicit in the AS 4390 definition of appraisal was in practice far too limited. Attempts in the 1990s to develop a methodology for a documentation strategy implicitly recognised these limits and sought to look to a broader appraisal context than one institution or one region, or to consciously and explicitly expand the concept of stakeholders. This deserves revisiting as an enriched means of documenting context and engaging communities outside the normal reach of archival institutions. Looking for collaborative ways to appraise complex issues or activities which embrace non-institutional views and non-custodial means of managing preservation and access would escape the single institutional view dominant in current practice and would again provide lessons that could broadly be applied to reinvent archival methods.

Re-engage business

Archival institutions are increasingly recognising the need to engage with enterprise ICT strategies and with corporate enterprise governance issues. Building upon this engagement, archival institutions and records staff across organisations need to work to demonstrate the utility of systematic appraisal to contemporary business. The complexity of current compliance regimes provides one opportunity to show how systematic appraisal of business activities can help. Archivists could also demonstrate how appraisal can help overcome the problems of fragmented business and recordkeeping environments with an effective information creation and management strategy. In these endeavours, appraisal should be undertaken to identify the recordkeeping requirements for organisations' activities without implying control by archival institutions. Whether appraisal is used as a risk management strategy or to demonstrate organisational compliance with the regulatory regime, it is undertaken first and foremost for business purposes, not as a grab for the 'important' records.

Once the complex, contemporary regime for managing access to information and records is taken into account, the need to build personal information management and

means of managing access rights over time into appraisal is obvious. The growing prominence of public concerns about privacy offers another opportunity to bring record-keepers and archivists to the table.

In addition to the defensive utility of managing risk and compliance, the positive aspects of appraisal can be shown in realising the value of large accumulations of data. The value of these accumulations of data will be enhanced if appropriate recordkeeping to control, authenticate and manage them is built into their design, not bolted on after the event. Whether the data is accumulated from transactions with clients or from research or developed iteratively over time, adequate identification and authentication of the data and the management of rights (access and intellectual property) from the outset increases its usefulness to organisations and its sustainability. Appraisal as part of the business analysis and design enables management of data growth and timely and com-pliant disposal, and archival institutions and others need to work to develop effective ways of communicating these messages.

Sadly, business analysis and management of current recordkeeping has been sepa-rated from the daily practice of most archivists in archival institutions. The struggle to establish a robust, digital archival practice is both a consequence and a reinforcement of the division of labour which has occurred over the past two decades. The focus on implementation of elaborate EDRMSs in organisations and the preoccupation of archi-val institutions with their own issues cut recordkeepers out of the picture just as major developments in computerised business applications took off. The question now is how do archivists re-enter the field to respond to the problems and demonstrate that record-keeping based on systematic appraisal will help solve many of them. Individuals in or-ganisations of course will continue to build their relationships and seize opportunities as they present themselves, but the onus is on the archival institutions with the legislative mandate to act. A strategy is needed to set priorities and to re-engage with contempo-rary business operations to overcome the invisibility of recordkeeping. While there are competing priorities including the issue of the very survival of independent archival institutions, if adequate recordkeeping is not implemented in contemporary organisa-tions the future of those archival institutions will be reduced to keeping paper relics. In this sense, reordering of priorities and strategies is needed as much as review of archival methods.

Endnotes

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3. AS/NZS 4390: *Records Management*, Standards Australia, Homebush, 1996.
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5. Unfortunately, identifying and managing access requirements as a core function of record-keeping did not receive the same attention in this and other codification exercises. Today this lack of serious access-specific analysis has left archivists ill-prepared for the complexi-ties of the current regulatory regime and for negotiating the overlap and contradictions of archival, freedom of information and privacy protection legislation in the era of rights to personal information protection, large-scale digitisation and revelations of mass surveillance.

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9. David Rosenthal, 'Let's Just Keep Everything in the Cloud', 14 May 2012, available at <*http:// blog.dshr.org/2012/05/lets-just-keep-everything-forever-in.html*>, accessed 13 December 2013.

10. See examples in the data visualisations at <*http://www.informationisbeautiful.net/2013/ worlds-biggest-data-breaches/*>, accessed 18 June 2014.

Appendix

Here are some initial directions which we consider could focus discussion about recovering an appraisal framework in ways that address the complexities of current business activity and contemporary recordkeeping:

- providing and implementing an exemplary recordkeeping strategy in contemporary organisations;
- fostering an understanding of recordkeeping's advantages and responsibilities in organisations;
- determining and marketing a risk-based documentation strategy for functions or jurisdictions to set priorities in areas of highest community and business needs;
- building support for recordkeeping by design in business and system environments; and,
- determining a risk-based policy on legacy data to allow its appropriate retention or destruction.

There are however many, many others.

Solutions to all these issues need to be fast and they need to be radical to attract attention and responses, and it's up to us to develop them. To make a start, we need to prioritise based on areas of high risk, we need to engage, we need to collaborate and we need to do it now.