

Archives and Administrative Change —

Some Methods and Approaches (Part 3)

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Australian Archives

The previous parts¹ have looked in turn at administrative history aspects and the effects of administrative change on records in government departments. The third (and subsequent) parts will review the effects of administrative change on archives and records administration and will consider the extent to which archival principles need to respond to an environment in which change is a constant feature. We will not, however, touch on the more general effects of administrative instability, such as result from the Australian Archives (and its predecessor, the Commonwealth Archives Office) having been attached in turn to *six* different departments of state in as many years².

Transmission of Disposal Classes

A disposal class, the basic element in a disposal schedule, we define as ‘a group of records . . . which, being of similar function and content, merit the same disposal action’³; that is, the records identified as being part of a disposal class are deemed to have the same value. As such, a disposal class can be a group of records within a complex filing system (for example, a class within a series of general correspondence files containing a variety of file types and subjects); it can also be a whole series (that is, each item in the series has similar informational content, a series composed of the same form being an obvious example); a group of simple series (that is, series created for the same purpose or covering the same subject matter); or a general class common to the records of a number of agencies. As Archival Authority for the Commonwealth Government, the Australian Archives achieves its dual objective of authorizing the destruction of ephemeral records and of ensuring the selection of essential archives for preservation through the issue of general disposal schedules (for administrative or ‘housekeeping’ records of most agencies), disposal schedules (for particular agencies or all state

branch offices of an agency) and disposal sub-schedules (the latter being mainly for complex series of correspondence files.)

One serious effect of administrative change is the increasing obsolescence of disposal schedules. Along with the records documenting a function, so too the related functional disposal classes are transmitted to successor agencies; thus a disposal schedule issued for a particular agency will no longer fully reflect the current records of an agency. If at the same time the predecessor agencies become defunct, and new agencies are created, then one is left with disposal schedules solely for abolished agencies. Such have been the effects of administrative change on disposal schedules within the Commonwealth Government.

Given our limited staffing resources and the considerable work-load involved in revising disposal schedules, our first approach from 1968 was to try to salvage as much as possible from existing disposal schedules by ascertaining whether they could continue to apply, at least in part, to the new administrative arrangements. Such reviews led to the development of 'disposal arrangements indexes' for each department of state, listing all the agencies associated with the department and for each agency showing relevant disposal schedules, with comments on obsolescence and with references to any appraisals outstanding.

The effects of the increased rate of change from 1972 was to make almost all disposal schedules obsolete or out-of-date. It became obvious that part of the solution to this problem lay in greater reliance on what are termed 'general' disposal schedules, i.e. schedules covering management services administrative (or 'housekeeping') records common to most agencies, of which five had been issued in the period 1950-1955. Greater emphasis on general disposal schedules was one of the recommendations stemming from a National Archives Task Force, Technical Support Group review in 1974⁴, another recommendation being the establishment of a separate section to concentrate on appraisal work and disposal planning and review.

Our new Disposal and Appraisal Policy Section, headed by Ms. D. Easter, was established in September 1975, with the specific task of developing general disposal schedules as well as giving more impetus to disposal work generally. In addition to the new Section, further positions have also been created in some Australian Archives regional offices to assist with the practical implementation of our disposal programme. A new general disposal schedule (no. 7) for Management Services records was issued in September 1977, and a further general schedule (no. 8) for Building, Works and Property records in April 1979. A number of other general schedules are close to completion, including those for financial records and personnel and establishment records.

The new Section has completed and updated disposal arrangements indexes for all departments of state and is developing systematic procedures for the revision of schedules and sub-schedules affected by administrative change, in accordance with the following overall pattern⁵:

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|---|--|
| <p><i>Effect on Records</i></p> <ul style="list-style-type: none"> • simple transmission or succession • complex splitting of records | <p><i>Effect on Disposal Schedule</i></p> <ul style="list-style-type: none"> • Cancel existing operative disposal schedule. • Issue the successor controlling agency with a new schedule based on the provisions of the superseded schedule. • Revise existing schedule of predecessor agency to delete classes as appropriate. • Issue to the successor agency/agencies a new schedule covering series or disposal classes reflecting transferred functions (if successor agency has no appropriate disposal schedule), <p style="text-align: center;">or</p> <ul style="list-style-type: none"> • Revise existing schedule for successor agency/agencies to incorporate series or classes reflecting the transferred functions. |
|---|--|

While the issue of the staffing resources necessary for the Australian Archives to overcome the backlog in preparing disposal schedules for functional records of particular agencies has yet to be settled, steps have also been taken to encourage greater involvement by agencies themselves in the development of disposal schedules. A *Guide to Records Disposal Procedures*, giving practical advice, was issued to agencies in November 1978. It introduces new forms to be used by agencies in submitting disposal proposals (NAS 235, Proposal for Disposal of Non-File Record Series; NAS 236, Proposal for Disposal of File Records), with provision for agencies to describe their record series and to justify their retention from an administrative and legal viewpoint. The forms also enable Australian Archives' appraisal reports to be included on the same sheets. It is hoped that agencies will formulate comprehensive disposal programmes for their records in line with Dr. Lamb's recommendation that 'all departments should be required to co-operate with Archives in the preparation of disposal schedules for their operational records, and a date, a few years ahead, should be set by which they would be required to have completed the task'⁶.

Another 1974 recommendation still to be implemented is the compilation of a record of precedent decisions and an overall index to disposal classes in all schedules, to facilitate reference to earlier decisions and cross-comparison in appraisal work, regardless of the department or agency responsible for the government function concerned at any particular point or time.

Concepts of 'Creating', 'Transferring' and 'Controlling' Agencies

In the best of all possible worlds, the agency which produces the records ('creating' or 'recording' agency) would also be the agency which transfers them to archival custody. Indeed, even today, in a number of

cases this is still so. However, with administrative changes becoming more frequent and complex, records created by one agency are increasingly transferred to archival custody by a successor agency or a number of successor agencies, which in their turn in time may themselves be succeeded in function by yet further agencies. On occasion, changes may well occur 'even during the time it takes to process a series for transfer,' as M. Roper has pointed out in U.K. experience⁷.

Jenkinson, in his *Manual of Archive Administration*⁸, makes reference to this transmission of archives from one 'administration' to a successor administration, which then transferred them to archival custody. This distinction between 'creating' agency and 'transferring' agency was introduced into the Commonwealth National Library Archives Division in 1953 by Mr. I. Maclean as part of a revised accessioning system⁹, the 'transferring' department being shown on the Accession Record (form CA 11) and the 'creating department' on the Series Identification Sheet (form CA 17) for each series in an accession. The revised accessioning system was deliberately devised to cope with aspects of administrative change and marks the inception of emphasis on the record series as the essential level of archival control. However, since it was based primarily on accessions by 'transferring' department, the accessioning system had the result on the physical plane of breaking up an original series into a number of separate accessions, some emanating from more than one transferring agency, others even from the same agency overlapping in content chronologically or numerically¹⁰.

The distinction between 'creating' and 'transferring' agency was taken a stage further in 1962-1963, when, in part to overcome this fragmentation of series, 'transitional control' record groups were systematically introduced for the first time by Dr. K. Penny¹¹. The inherent conflict between the two concepts was solved by having in fact two record group systems, one for older pre-1940 archives by 'creating' agency (with mnemonic identifying symbol plus series number) and one for more recent records by 'transferring' agency (with group number plus series number). Despite its increasing emphasis on 'creating' agency, this dual system had on the physical plane the disadvantage in some cases of assigning different numbers to older and younger parts of the same series — in some instances, more than two numbers, where portions of more recent split series were transferred by a variety of successor agencies or where portions of multiple-provenance series were broken up between successor creating agencies.

In a further review of our accessioning procedures for the new series system in 1965-1966, it was apparent that to the existing distinction between 'creating' and 'transferring' agencies we needed to add a third concept: that of 'controlling' agency, to reflect the effect of the increasing rate of administrative change, where a 'transferring' agency had itself either been abolished or its functions transferred to a successor agency or a number of successor agencies, which were now responsible for the accessions in archival custody. The term 'controlling' was

introduced to denote the agencies' control over the records in respect of withdrawal and use of records relating to their functions (via the Archives Lending Service); retention or destruction; and public access. The concept of 'controlling' agency was developed by Mr. R. Gordon in 1966, largely as a result of his work on records of the former Department of Commerce and Agriculture (CA 48) (abolished in 1956), where control over the records was 'shared' by its successors, the Department of Trade (CA 64) (itself changed to the Department of Trade and Industry (CA 66) in 1966) and the Department of Primary Industry (CA 63). Thus a file, produced by the Department of Commerce ('creating') and transferred to archival custody in 1963 by the Department of Trade ('transferring'), subsequently in 1966 became the responsibility of the Department of Trade and Industry ('controlling'). Since that date, control has passed twice to two subsequent successors in function, in 1972 to the Department of Overseas Trade (CA 1485) and in 1977 to the Department of Trade and Resources (CA 2477). In this way we have reflected what we have termed the principle of functional sovereignty over records¹².

The concept of 'controlling' agency is now also contained in provisions of the *Archives Bill 1978*¹³, with phrases such as:-

S. 3 (1) 'responsible Minister', in relation to a Commonwealth record, means the Minister to whose ministerial responsibilities the record is most closely related;

S. 29 (1) 'The Archives shall ensure that all Commonwealth records received into its custody from a Commonwealth institution are made available, as reasonably required, for use by, or at the direction of, that institution, or a Commonwealth institution that has succeeded to the relevant functions of that institution.'

In our series control system, both the creating agency/agencies and controlling agency/agencies for a series have been shown on the series registration sheet (form NAS 39) since 1966. Under the series system there is no longer any need for the concepts to impinge on the physical plane. The transferring agency has become much less important and is simply recorded on the series accession history (form NAS 139) and the accession record (NAS 43).

While all three concepts, 'creating', 'transferring' and 'controlling', have valid connotations and application to archival work, it remains our view that, for basic arrangement, description and reference, the 'creating' agency is pre-eminent¹⁴. In this we reflect the views of Jenkinson who recommends classing archives 'under the Administrations which actually created them'¹⁵ and more explicitly —

The place, then, from which Archives are received should be a matter recorded by their Accession Numbers and the Accession Register; and may serve as a temporary class heading for the unidentified; but it is not to be used normally to supply their primary division. That is provided by the *Administration which produced them* [our italics].¹⁶

Muller, Feith and Fruin stress that an archival fonds is the material '*produced by an administrative body*'¹⁷ and that —

The archival [fonds] of an independent administrative body should as a rule be arranged and described separately, even if the rights and functions of that body later passed to another.¹⁸

Level of Definition of 'Agency'

Administrative change has also had its effect on our approach to the level of definition of 'agency' or 'record group' (the problem being similar whichever concept is used); that is, using the words of M. Duchein¹⁹, there has in general been a shift from the 'maximalist' position ('record group' as a whole ministry) to the 'minimalist' ('record group' as a smaller sub-ordinate office).

The level of definition of 'agency' and 'record group' has already been alluded to in a previous article²⁰. The relatively 'maximalist' Jenkinsonian definitions of 'Administration' and 'Archive Group'²¹ were first considered for application in the Commonwealth N.L. Archives Division as being co-extensive with a ministry or department of state²², but by 1962 a decision had been made to establish 'separate Archive Groups (rather than Sub-Groups) for substantially independent offices within departments'²³, to take account of those elements — subordinate offices, boards, commissions, committees etc. — which continue substantially unaltered at times of administrative change and simply move one department/ministry to another.

We moved further from the maximalist position in 1965 with the adoption of the 'agency' concept by which we understood that —

within the context of a government it may be the office of the head of state, the Central office of a major department, or the regional office of a bureau; that is, it may be at any level in the administrative hierarchy²⁴.

In 1965-1966, we registered more than 1000 agencies, using existing files of administrative history source material²⁵. As at March 1980, we have recognized and registered some 2988 agencies for the Commonwealth Government, its territories and its predecessors in function. This total is in contrast to the United States National Archives, which although distancing itself from Jenkinson's 'archive group' has tended to retain a maximalist stance even with its record groups at the 'bureau' level (only 350 record groups in 1964)²⁶, with a number of what are termed 'collective record groups'²⁶. The 'knotty' problem of a sub-ordinate bureau being transferred 'away from its old superior and lodged under a new authority' had been acknowledged in the U.S. by 1940²⁷.

There is, of course, danger of moving too far in the 'minimalist' direction. As Duchein points out, 'one runs the risk of depriving the notion of 'fonds' of all real meaning'²⁸. It is in part for this reason that the Australian Archives, as previously pointed out²⁹, does not normally

register as separate agencies the functional division, branches, or sections of an administrative entity; in so doing, we not only avoid the even greater instability of such internal divisions and sections³⁰, but also reflect the reality that such internal divisions do not, as a general rule, have separate general record-keeping systems of their own. Internal committees are similarly treated³¹. One major exception has been in the treatment of the relatively small but complex administrations of the Australian Capital Territory, and the Northern Territory. For example, in the A.C.T., sections of the Department of the Interior [II] (CA 31) and its successor, the Department of the Capital Territory (CA 1477), often have a functional role and separate record-keeping equivalent to full departments in governments of the Australian States; such sections have normally been regarded as having agency status.

Regional state branches of Commonwealth Government departments and authorities are normally recognized as separate agencies in their own right, distinct from their central offices³². State offices were already elevated from sub-group to separate group status in 1959³³. This recognition reflects both their separate record-keeping status and the decentralized archival storage practices in the Australian Archives, with its regional network of archives repositories progressively developed since the late 1940's. Regional branches of departments often have a different life-history from their central offices. One obvious example would be the Collectors and Sub-Collectors of Customs at the various ports from 1827, attached in turn to the United Kingdom Board of Customs, from 1852 to the several Australian Colonies (usually under the Colonial Treasury), from 1901 under the Commonwealth of Australia to the Department of Trade and Customs (CA 10), from 1956 to the Department of Customs and Excise (CA 62), from March 1975 to the Department of Police and Customs (CA 1862) and from December 1975 to the Department of Business and Consumer Affairs (CA 1951). Another example would be the Commonwealth Public Service Inspectors in each state, reporting in turn to the Public Service Commissioner (CA 597) and from 1923 to the Public Service Board (CA 197).

Changes of name to agencies can cause debate as to whether or not one should recognize a new name as implying a new agency. In Part 2³⁴, we have already pointed out that a change of name at the level of Commonwealth department of state (ministry) is recognized by the Australian Archives as resulting in a new agency, but minor variations in agency titles at lower levels may not be so regarded, unless there is a substantial accompanying change in function.

In departing from record groups or agencies co-extensive with a ministry/department of state, the Australian Archives has consciously

recorded the relationship of subordinate agencies in two ways, both of which have already been described in our first part³⁵ —

- by ‘inventories of agencies’, listing all agencies which have at any time been associated with a department, showing their transfer from or to other departments³⁶; a sample is at Figure 1.
- by recording on each agency’s registration sheet³⁷ the departments and other agencies to which it was subordinate, thus defining its position in the structure of government — and in this regard we are glad to adopt M. Duchein’s apt notion of ‘hiérarchie des fonds’³⁸.

A new more precise definition of ‘fonds’ or ‘agency’ has also been needed to reflect this departure from the Jenkinsonian ‘Administration’ or even the adaption already given by 1962 by Maclean²³. In 1966, the decision was made by Dr. K. Penny and P. J. Scott to define ‘agency’ not so much by reference to its administrative status or administrative independence but principally by reference to its degree of *independent record-keeping*³⁹, that is, whether the administrative entity had its own general correspondence filing system (the 20th Century administrative “backbone”⁴⁰ or “skeleton”⁴¹, *par excellence*) or, if a board, commission or independent committee, its own system of minutes or proceedings. In this, we followed comments by Muller, Feith and Fruin, on what constituted a separate ‘fonds’ —

- The criterion of whether or not an official forms an independent archival [fonds] has sometimes been made to depend on the question whether he carries on *written correspondence* with the body to which he is sub-ordinate [*our italics*]. Although correct in many cases, this rule cannot be taken as absolutely infallible, and here also each case must be considered by itself⁴².
- Committees which have left resolutions (or minutes) have created an archival [fonds] of their own. This [fonds] should remain independent⁴³.

There are, consequently, cases of administrative bodies, with distinct titles, even established by statute, which are not treated as separate agencies, when they do not have independent records but use the filing system of an agency with which they are closely linked. An example would be the statutory Office of Parliamentary Counsel, 1970—, the files of which are maintained in the general registry filing system (CRS A432) of the Attorney-General’s Department (CA 5)⁴⁴. Such ‘sub-agencies’, as we term them⁴⁵, are included as additional entries in the title of the main agency and may be indexed in the normal way in our Agency Index. We have found the phenomenon to be of high frequency particularly in Tasmania⁴⁶, where a regional office of one department may also undertake activities on behalf of other departments, and thus have a number of sub-titles, all of which may change at different points of time: An example would be the Commonwealth Electoral Office,

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FIGURE 1 : A SAMPLE INVENTORY OF AGENCIES ORGANISATION:

COMMONWEALTH OF AUSTRALIA -
CA 7, DEPARTMENT OF EXTERNAL AFFAIRS [1]

CO 1

		1901 - 1916	
		<u>Inventory of Agencies</u>	
Entry No.	Agency title	Date range	Agency No.
NAS 29 (revised)	5. Governor General's Office [TO CA 11, TREASURY, 1905]	1901 -	CA 1
	6. Federal Executive Council [TO CA 12, PRIME MINISTER'S, 1911]	1901 -	CA 2
	7. Parliamentary Departments:		
	8. House of Representatives Department	1901 -	CA 692
	9. Senate Department	1901 -	CA 691
	9. Parliamentary Library (Department)	1901 -	CA 694
	10. Parliamentary Reporting Staff (Department) [TO PARLIAMENT, 1901] [Funds for Parliamentary Departments were under the control of the Minister for External Affairs until 30 June 1901]	1901 -	CA 695
	11. Royal Commission on the Affray at Goaribari Island, British New Guinea [The Commission was established by Letters Patent on 25 July 1904 and submitted its report on 7 September 1904]	1904	CA 977
	12. Commonwealth Offices, London [The initiative for a Commonwealth Office in London lay with the Department of Defence. In addition to Defence orders, the Offices were involved in receipt and expenditure of monies, Australian coinage orders and matters related to the Australian Coat of Arms. The agency was replaced by the High Commissioner's Office (CA 241), q.v.]	1906 - 1910	CA 976
	13. Commonwealth Literary Funds ("Men of Letters Fund") [TO CA 15, HOME AND TERRITORIES, 1916]	1908 - 1973	CA 608
	14. High Commissioner's Office, London [TO CA 12, PRIME MINISTER'S, 1916] [Replacing the Commonwealth Offices (CA 976), the first High Commissioner of the Commonwealth in the United Kingdom was appointed on 22 January 1910, to act as representative and resident agent, exercising such powers and performing such duties "as are conferred upon and assigned to him by the Governor-General"]	1910 -	CA 241
	15. Institute of Tropical Medicine, Townsville [TO CA 15, HOME AND TERRITORIES, 1916]	1910 - 1930	CA 552
	16. Australian Commission for Panama - Pacific Exhibition, San Francisco, 1915	1914 - 1915	CA 980

Tasmania (CA 969), which also undertook functions on behalf of five other agencies. The agency title is given thus:

(1) Commonwealth Electoral Office, Tasmania	1903-1948
[Also] (2) Public Works Branch, Tasmania	1903-1932
(3) Works Registrar, Works and Services Branch/(by 1947) Department of Works and Housing	1932-1948
(4) Deputy Commissioner of Old-Age Pensions, Invalid Pensions, Maternity Allowances and War Pensions/(by 1920) Deputy Commissioner of Old-Age Pensions, Invalid Pensions and Maternity Allowances, Tasmania	by 1918-by 1943
(5) Deputy Public Service Inspector, Tasmania	1903-by 1936
(6) Public Service Inspector, Tasmania	by 1936-by 1948]

In Canada, the criterion of independent record-keeping has now also been included in the definition of record group —

. . . any body of records of the federal government of Canada or its predecessors that are organizationally or functionally related by administrative continuity. In practical terms, this usually means that a separate record group is created for each department branch or agency that maintained at any point in its existence *a separate and self contained registry system*. [our italics]⁴⁷

In his review of the definition of ‘fonds’, M. Duchein proposes several criteria to be applied — a creating agency must have (a) a proper title and legal existence resulting from a definite and dated instrument such as an act of parliament, order in council, decree etc.; (b) precise and stable functions, defined in a document of legal or statutory standing; (c) a precisely defined position in the administrative hierarchy — in particular the higher level agency to which it is subordinate must be clearly known; (d) a chief officer of some responsibility, with decision-making powers corresponding to his level in the hierarchy; and (e), as far as possible, its internal organization should be known and set out in an organization chart⁴⁸. In doing so, Duchein is in our view insisting on a rather formal basis for agency definition — too formal for quite a number of nonetheless real agencies — and making it still too dependent on administrative status rather than on record-keeping. The Office of Parliamentary Counsel, quoted above, would meet all of Duchein’s criteria, but it is not an agency in our terms since it does not have independent general record-keeping⁴⁴. In many other respects, however, including treatment of sub-ordinate and regional agencies and internal divisions of agencies, we are at one with M. Duchein.

A reformulated definition might be: an agency is a part of an organization, at any level in the administrative hierarchy, which has (or

had) its own independent general record-keeping system (or, if a Board etc., its own separate system of minutes or proceedings) and its own distinctive and generally consistent basic name or title over a given period of years.

Owing to considerations of space, sections of this article relating to the effects of administrative change on other aspects of archives management, including the treatment of multiple-provenance series, the treatment of re-arranged and split series, together with the recording of changes to record series, will appear in subsequent parts.

Acknowledgements

In the preparation of this part, we wish to acknowledge the advice and assistance of a number of our colleagues, whose contribution we have indicated in the text or in the notes and references. Special thanks are due to Ms. D. Easter for her advice on the transmission of disposal classes, to Miss M. I. Wheeler for information on agency concepts, and, not least, to Ms. G. Hatch, typist in our N.S.W. Regional Office.

Errata

The following printing errors in Part 2 should be corrected:

p. 156 — For ‘the phenomenon of multi-provenance series’, read ‘the phenomenon of *multiple*-provenance series’.

p. 161 — For ‘for archival efficiency . . . involved’, read ‘for archival efficiency, we need to ensure orderly transfers of records between agencies *with* the least possible disruption to *the original* record-keeping systems involved’.

Additions

The following additional articles and publications have been noted since the appearance of Part 1:

Note 6. Dr. Wettenhall’s charts have also been reprinted as Appendix 1 to the Senate Standing Committee on Finance and Government Operations, *Statutory Authorities of the Commonwealth, First Report* (Dec 1978), pp. 99-106. The Senate Committee has issued two further reports on statutory authorities (Oct 1979, Jan 1980).

Note 19. See also P. Coaldrake, ‘Commonwealth Government Administrative Arrangements, 1972-1978’ in *Australian Journal of Public Administration*, Vol. XXXVII, No. 4 (Dec 1978), pp. 413-415. [Appended are three very useful agencies analysis charts of Commonwealth Departments from the Whitlam Government in December 1972 through to December 1978, similar to those published by the Public Service Board in its 49th *Annual Report*. The administrative changes from MacMahon to Whitlam in December 1972 still remain to be charted].

FOOTNOTES:

1. For Part I, see *Archives and Manuscripts*, Vol. 7 No. 3 (Aug. 1978), pp. 115-27 and for Part 2, No. 4 (April 1979), pp. 151-65. Hereafter, Part 1 and Part 2, respectively.
2. The Commonwealth Archives Office in 1971 was part of the Prime Ministers' Department (CA 12). Subsequent departments were:-
1971 (March-May): CA 1402, Department of the Vice-President of the Executive Council
1971 (May)-1972: CA 1407, Department of the Environment, Aborigines and the Arts
1972-1975: CA 1490, Department of the Special Minister of State
1975-1977: CA 1964, Department of Administrative Services [II]
1977- : CA 2474, Department of Home Affairs [II].
3. Australian Archives, *Guide to Records Disposal Procedures* (1978), Section 'Explanation of Archival Terminology'. See likewise *General Disposal Schedule No. 7*, p. 13. The full definition has '... a group of records within the same record series or an individual record, or a group of forms with the same form no. which. . .' See also Public Service Board, *Handbook for Departmental Registrars* (1962) p. 83, which has a simpler statement: 'a class of records, all the items in which merit the same disposal treatment'.
4. National Archives Task Force, Technical Support Group, Survey and Disposal Work, Provisional Outline, pp. 10-11.
5. Initial procedural notes on the effect of administrative change on disposal authorities were prepared by Ms. D. Easter in January 1977, and what follows is summarized from those notes.
6. Department of the Special Minister of State, *Development of the National Archives: Report, September 1973*, by W. Kaye Lamb (A.G.P.S., 1974), p. 8.
7. The increasing frequency of changes in the machinery of government in the United Kingdom, with its affect on the transferring department, was alluded to by Michael Roper in his article 'Modern Departmental Records and the Record Office' in the *Journal of the Society of Archivists*, Vol. 4, No. 5, April 1972, pp. 403-4. 'Changes have been taking place not only between successive transfers of records in the same series but even during the time which it takes to process a series for transfer'.
8. Sir Hilary Jenkinson, *A Manual of Archive Administration*, reprint of 2nd edition, London, 1965, Part II, S. 2, pp. 32-8.
9. See Commonwealth N. L. Archives Division, Administrative Instruction No. 34, 1 September 1953. 'Interim Instruction on Procedure for Accessioning Records'. Also Commonwealth N. L. Archives Division, Staff Information Paper No. 1, November 1953, 'Principles and Practice of Archives Management as applied to Accessioning Procedure'.
10. See I. Maclean, 'An Analysis of Jenkinson's 'Manual of Archive Administration' in the Light of Australian Experience' in A. E. J. Hollaender (ed.), *Essays in Memory of Sir Hilary Jenkinson* (1962), p. 137.
11. I. Maclean, *loc. cit.*, pp. 146-7.
12. Part 2, p. 151.
13. Introduced in the Australian Senate, 9 June 1978 (*Hansard*, p. 2692). Similarly also section 24 (4) re disposal, destruction etc. of Commonwealth records.
14. See P. J. Scott, 'The Record Group Concept: A Case for Abandonment' in the *American Archivist*, Vol. 29, No. 4 (Oct 1966), pp. 493-495. See also I. Maclean, 'Jenkinson's *Manual* in Australian Experience' in A. J. Hollaender (ed.), *Essays in Memory of Sir Hilary Jenkinson* (1962), p. 146.
15. Jenkinson, *op. cit.*, part II, s. 6, p. 103.
16. Jenkinson, *op. cit.*, Part II, s. 6, p. 88.
17. Muller, Feith and Fruin, *Manual for the Arrangement and Description of Archives* (trans. Leavitt), re-issued New York, 1968, s. 1, p. 13.
18. Muller, Feith and Fruin, *op. cit.*, s. 52, p. 130. See also s. 53, p. 133 for a qualification. Similar views have been expressed by M. Duchein in 'Le Respect des fonds en archivistique: principes théoriques et problèmes pratiques' in *La Gazette des Archives*, No. 97 (1977), pp. 83-4, 'organisme producteur' et 'organisme versant'.

19. M. Duchein, *loc. cit.*, p. 77.
20. See P. J. Scott, 'Facing the reality of administrative change — some further remarks on the record group concept' in *Journal of the Society of Archivists*, Vol. 5, No. 2 (Oct. 1974), p. 97.
21. Jenkinson, *op. cit.*, s. 6 (p), p. 101. Note Jenkinson's footnote 3 re size of the Administration — 'one man or twenty' — which in present day terms would mean a very small office.
22. See Commonwealth N. L. Archives Division, Staff Information Paper No. 1, (1953) p. 10. The definition of 'archive group' is given as : 'all the records in archival custody of a department or other agency of the Commonwealth Government or of a Commonwealth Statutory Organization, which is independent of outside direction (other than Ministerial or Parliamentary) in the conduct of its business — e.g. Prime Minister's Department, Public Service Board, High Court of Australia, Commonwealth Bank. *Closed*: An Archive Group is 'closed' when all available archives of the particular administration are in custody — e.g. Rationing Commission. *Open*: An Archive Group is 'open' when further records remain to be transferred, whether the administration has ceased to function or not.
See also the definition of record group adopted by Australian Archivists at the Seminar on Archives Management 1954 in *Instructions for the preparation of Inventories* (1955). See also P. J. Scott *loc. cit.* (1966), p. 497 (5).
23. I. Maclean, *loc. cit.* (1962), p. 146. This was proposed in 1959 in 'Tentative Rules for Arrangement' in Archives Division circular on Arrangement and Description of Archives.
24. See P. J. Scott, *loc. cit.* (1966), p. 501.
25. Part 1, p. 119.
26. See O. W. Holmes, 'Archival Arrangement — Five Different Operations at Five Different Levels' in the *American Archivist*, Vol. 27, No. 1 (Jan 1964), p. 26. The record group is defined by P. M. Homer in the *American Archivist*, Vol. 5, No. 2 (Apr 1942), p. 89 as 'a major archival unit established somewhat arbitrarily with due regard to the principle of provenance and to the desirability of making the unit of convenient size and character for the work of arrangement and description and for the publication of inventories'. See also T. R. Schellenberg, *Modern Archives* (1956) p. 181, and *The Management of Archives* (1965), p. 162.
27. See A. R. Wright, 'Archival Classification' in the *American Archivist*, Vol. 3, No. 3 (July 1940), p. 180-81.
28. M. Duchein, *loc. cit.* p. 79.
29. Part 2, p. 153, section (4), Change in Status or Level.
30. M. Duchein, *loc. cit.*, p. 90: 'Malheureusement, ces divisions structureuses [de l'organisme] sont rarement stables'.
31. cf. Muller, Feith and Fruin, *op. cit.*, s. 54, p. 135, and s. 55, p. 137.
32. Likewise Duchein, *loc. cit.*, p. 80: 'les organes locaux dependant d'un organisme central produisent des fonds d'archives qui leur sont propres'.
33. Our present position marks a change from the previously maximalist stance of a group coextensive with a whole ministry that is, one covering both central and state offices. Already in 1953, however, Mr. I. Maclean had acknowledged the problem thus: 'Parts of the same Archive Group may be physically separated in decentralised repositories and must remain as long as the department itself is decentralized' (Staff Information Paper No. 1, p. 2). In the 'Tentative Rules for Arrangement' in Archives Division circular of 25 June 1959, Maclean states: 'The major unit of shelf arrangement will be the "Group" which will be approximately the equivalent of what in the past has been thought of as a sub-group. This means that the Central Office of a department may be one group and a State office of the same department another group'.
34. Part 2, p. 152, section (2), Change of Name.
35. Part I, pp. 122-3, p. 124-26.
36. The need for this has been stated in the U.S.A. by A. R. Wright, *loc. cit.* (1940) p. 180, as follows: 'the classification place for the whole government should afford a place in each department for every bureau which in its historical development

remained for a time in the department. The same plan [would be applied] to the more subordinate agencies'.

37. See Part 1, p. 124, Figure 3.
38. M. Duchein, *loc. cit.*, (197) p. 80.
39. P. J. Scott, *loc. cit.*, (1966) p. 501.
40. Jenkinson, *op. cit.*, s. 6(r), p. 105.
41. Muller, Feith and Fruin, *op. cit.*, s. 20, p. 69.
42. *ibid.*, s. 54, p. 137.
43. *ibid.*, s. 55, p. 137.
44. Since the above was written, we have learned that the Office of Parliamentary Counsel established its own general registry system in July 1979 and has thus reached agency status (information from Mr. P. Feldman, Australian Archives, Survey and Disposal, A.C.T.). This does not invalidate the argument, since from 1970 to 1979 the Office was not a separate agency.
45. Procedural notes by Sub-agencies were prepared by P. J. Scott in February 1972. The Office of Parliamentary Counsel was quoted then as an example.
46. Further procedural notes on Tasmanian agencies were prepared by Ms. J. Caldwell and Ms. G. Finlay in 1974.
47. Quoted by C. Vincent in 'A case study — The Record Group: A Concept in Evolution' in *Archivaria*, No. 3 (1976/7), p. 4.
48. M. Duchein, *loc. cit.*, pp. 79-80.