

DISPOSAL IN THE AUSTRALIAN ARCHIVES: NEW DIRECTIONS AND NEW CHALLENGES

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The process of appraisal and disposal as undertaken by the Australian Archives has undergone several changes in recent years. This article examines some of the recent developments and future directions of the Records Evaluation and Disposal Program in Australian Archives.

In the last issue of *Archives & Manuscripts* the editor had some things to say about the historic paucity of material submitted for publication on the subject of appraisal and disposal. He then was pleased to point out that there were five articles in the last two issues. He went on to say some very nice things about the work that is being done in the Disposal program in the Australian Archives. I gave the editor an undertaking some months ago that I was determined that no issue of *A & M* should appear without including something about the appraisal and disposal process in the Australian Archives. This articles gives an overview of some of the areas that are being addressed for development in the next year or so. It is a joint effort of most of the staff currently working in the section in Central Office.

It is now over six years since the Archives Act was proclaimed. The disposal provisions of the Act are amongst the most wide-reaching and, on first reading, restrictive. In the last six years the Australian Archives has been conservative in its interpretations of the provisions relating to disposal for a number of reasons. There has been the need to bed down the Act, to see how it has operated in the environment of a swiftly-

changing technological base, and to assist agency understanding of the disposal provisions. Recently, however, we have been interpreting parts of the provisions differently, because the needs mentioned above have been partly or fully satisfied, because we have better and more flexible procedures in place, and because we are becoming much more conscious that we are a client-driven organisation.

A basic but vital change has been the program's name; no longer is it just "Disposal" (which in the Commonwealth is often seen as getting rid of anything from broken furniture to old Mirage jets), but it is now known as Records Evaluation and Disposal, which gives a much better indication as to what we really do. We have delegated to our regional offices the power to issue disposal authorities, and the section in Central Office has been restructured to give concentration to our new functions. The new sub-sections are: National Operations (which co-ordinates the work being done nationally, and also liaises with our clients at a higher level than do the regions); Projects (which has responsibility for the personal and corporate archives service, and the development of our General Disposal Authorities); Development and Training (comprising the research and development function—including the vexed question of electronic records—and the putting together of training material for our regional office, and also agencies).

The pages below give a general outline of our thinking and approaches in the many areas that, in the Australian Archives, make up 'records evaluation and disposal'. I would welcome your comments.

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SHORT TERM VALUE RECORDS AND "NORMAL ADMINISTRATIVE PRACTICE"

The Archives Act 1983 covers disposal of Commonwealth records by prohibiting disposal actions such as:

- destruction;
- transfer of custody;
- transfer of ownership;
- damage; or
- alteration.

These actions are allowed where they are specifically required by another law, authorised by the Australian Archives, or where the action is a "normal administrative practice" (NAP). The NAP provision allows for the sensible conduct of government business. It is designed to avoid the situation where every administrative action affecting Commonwealth records would

require the formal approval of the Archives or of a specific law. In the past it has generally been applied to a few categories of records of a clearly ephemeral nature.

However, the NAP provision has the potential to be applied more widely, and recently we have examined how we define normal administrative practice for government agencies in an attempt to extend its use and usefulness. There is scope to use NAP to cover records which may have administrative value for several years but which do not have enduring values. To enable this to take place, the Archives has produced a booklet titled "*Just for the record . . . : how to destroy records as a normal administrative practice*" to assist agency officers in the identification of normal administrative practices. Its purpose is to allow NAP to be applied to a greater variety of short term value records than rough drafts and copies of publications. Records users and record managers are given relevant advice and information so that they can make appropriate disposal decisions regarding NAP material.

The booklet advises that records may be destroyed where they are:

- duplicated;
- unimportant;
- of short term facilitative value; or
- a combination of the above.

The test is whether it is obvious to the agency officer that no information of long term value is being lost by destroying the record. Examples are included in the booklet to amplify the general definition. In the future we intend to examine how agencies have applied NAP, and add to the list of examples based on their experience.

GENERAL DISPOSAL AUTHORITIES

The Australian Archives issues General Disposal Authorities to authorise disposal for a proportion of the records of all Commonwealth agencies. These authorities (formerly schedules) were, in the main, designed to cover records relating to "housekeeping" or maintenance functions which are common to many agencies. There are five GDS/GDAs in current use:

- GDS 10 for General Administrative Records (soon to be replaced by GDA 14);
- GDS 11 for Staff and Establishment Records;
- GDS 12 for Finance and Accounting Records;
- GDS 12A for Finance Forms; and
- GDA 13 for Accommodation, Property and Works Records.

During 1990/91 work will concentrate on two aspects; the revision of GDS 11 for Staff and Establishment Records and a complete review from basic principles of all matters relating to the GDAs. The aim of

the review is to determine how we could optimise the disposal coverage of records in GDAs in the most user friendly manner practicable. It will encompass Central and Regional Offices of a wide range of agencies both in Canberra and at other centres, and will address such matters as how records classes should be grouped in the GDAs for the various types of agencies; record types to be added to the coverage; format, presentation and indexing of contents, training requirements; and how to best promote the use of the GDAs in agencies. It is anticipated that at least some of the benefits of this review will be reflected in the GDA, or GDAs, for Staff and Establishment Records due for issue in December 1991.

“NEW” APPRAISAL CRITERIA

The criteria on which the disposal decision is made have been progressively refined over the last few years. To traditional considerations such as legal and research values have been added others such as “display” value and scarcity. Below is a summary of the criteria including a brief discussion of cost as an appraisal criterion.

Research value

Records must have a high degree of research value before they are considered for permanent retention. The extent of research value will also be affected by other considerations such as reliability, accessibility and duplication. It must be weighed against the cost of permanent retention.

Policy and precedent value

This is sometimes a quick way of identifying research value. However, not all policy and precedent records need to be retained—only those which document significant policy or precedent.

Intrinsic interest or ‘display’ value

This covers the situation where an individual item may be worth keeping permanently where generally such records would not be retained. For example, an ordinary piece of temporary value correspondence embellished with a cartoon by a famous artist.

Administrative use

This covers the administrative needs of the creating agency to refer to a record.

Acts, Regulations or court orders

This covers the legal requirement for a record to be kept or destroyed. It also includes consideration of statutes of limitations.

Evidence of rights or obligations

Records have value as evidence of legal rights and obligations. In some circumstances the cost of retention would need to be weighed against loss caused by non-retention of the record.

Accounting/audit requirements

Records concerning receipt, expenditure and control of public money must be kept for accountability purposes.

Scarcity

This is a consideration which may enhance research value if the records are rare. In some cases, there may be so few records remaining that there is no meaningful context for them, and they are not worth retention.

Commercial value

Some records have monetary value apart from their value as archival resources. If they are also considered of temporary value, sale or transfer to the custody of others may be considered, depending on security and privacy considerations.

Duplication

Duplication may limit or negate the values in a particular group of records. Often appraisal involves a choice between two or more groups of records documenting much the same thing.

Reliability and completeness

Generally absence of these elements diminishes research value. However, in some circumstances inaccuracy or incompleteness are themselves evidence of a particular activity or event. Completeness is particularly relevant for electronic records where software and documentation may be needed for a complete record.

Accessibility

If retrievability of the records is a problem it may diminish their value. In a limited number of cases, where research value outweighs the cost, it may be desirable to rearrange the material or produce finding aids. Again, this is particularly relevant for electronic records.

Privacy

Protection of privacy may be considered when appraising some groups of records. However, it is not considered to be a reason for destroying records which have other values. Privacy is generally protected by restricting access.

Cost

Although it is often hidden, cost is an essential consideration in the decision whether to retain or destroy records. Recently the Australian Archives has identified some of the various costs associated with disposal of records in order to assist appraisers to incorporate this element in their decision making. There are costs associated not only with the storage of records, but also with their preservation, transfer to archival custody, maintenance, retrieval, and the provision of access to them. The formulation of classes to dispose of records is also a cost, and in some circumstances there may be an opportunity cost in retaining the record

and not re-using valuable media of which the record is made (in the case of X-rays, for example, from which silver can be reclaimed).

Cost of storage may be part of the decision not to retain a large quantity which may have some research value. Schellenberg identified this cost when he said, "since the records that are useful for studies of broad questions usually consist of large series that are costly to preserve because of their volume, the archivist should actively explore the interest of groups of scholars in them."¹ The research value will need to be clearly evident if the cost of retention is likely to be large. The cost of retention may also influence the length of time for which temporary records are kept. Deciding the appropriate retention period means balancing the diminishing need to consult the records against the cost of storage. The opportunity to refer to the records after a certain time may be merely convenient or handy and in this case retention beyond that point is unlikely to be justified.

Ongoing costs such as preservation and retrievability of the records may also be important in the disposal decision. These issues are particularly significant with electronic and photographic records where these costs may be large.

We will be progressively refining these criteria as the need arises. Some, such as cost, will need to be updated as time passes. It is expected that the appraisal of electronic records may have some influence on the way in which we define and apply appraisal criteria.

ELECTRONIC RECORDS

The need to specifically address the problems associated with the use of electronic records (ER) for data storage has brought the problem to the forefront of the issues to be dealt with by the Australian Archives in the 1990s.

The Australian Archives Corporate Plan for 1990/91 specifically targets, as a principal action, the development of standards for, and approaches to, the management of electronic records. In practical terms this will mean:

- the development of uniform standards for electronic records management for application by agencies and the transfer of electronic data to Archival custody;
- the testing of Archives' procedures against standards developed; and
- the development of a program for having ER standards accepted by agencies and the industry.

The direction and actions outlined in the Corporate Plan will formalise and add greater priority to a process which has been gaining momentum over the last few years.

Two major activities which came to fruition in 1988 were the development of a separate procedure for the appraisal of ER and the publication of the *When It's Gone It's Gone!!!* (WIGIG) booklet.

The development of the separate appraisal procedure was a result of the "codification" of a number of disposal and appraisal practices which began in the early 1980's and which now form part of the Disposal Manual series. The WIGIG process started as a case study, in the Department of Prime Minister and Cabinet, to evaluate the disposal practices of action officers using personal computers. This led to the publication of WIGIG, now in its third print run. As the title of the booklet suggests the prime purpose of WIGIG was to create a greater awareness amongst action officers of the implications of the disposal decisions being made each time they pressed the (delete) button on their computers. It aims to ensure that the values of information are considered before the button is pressed, and that the decisions made are not over or under retentive.

More recently two groups have been established, (one internal, one external) aimed at developing a more co-ordinated approach to ER problems and issues.

The first is the Australian Archives Working Party on ER which will develop and co-ordinate policy and procedure, applicable to the Federal Government sphere, in response to the Corporate Plan actions above. The second, which is more informal in nature, was developed under the auspices of the Australian Council of Archives and includes representatives from the Australian Archives, State Archives, C.S.I.R.O., University of N.S.W., Monash University, and the A.S.A. Technology Committee. The second group is so informal, in fact, that it does not have a proper name at the time of writing. However, from the first meeting in March, it was very clear that this was a much needed forum and fruitful discussion occurred on ER problems and issues which all participants agreed was an ideal way to improve industry communication and co-operation.

By the time you are reading this a revised and expanded procedure for the appraisal of ER will have been issued. The new procedure has the following components (additions from the "old" procedure are marked thus*):

- The procedure itself will contain an introduction, advice on establishing a project team, conducting a system overview, the appraisal process and the steps involved to complete the appraisal according to A.A. requirements;
- The appraisal criterion with comments relevant to ER*);
- Advice on formats for retention of data and background details on electronic record systems*);
- A new appraisal flowchart for ER;
- Checklists and forms for a systems overview;

- A bibliography for further reading*; and
- A set of questions to ask as part of the systems overview*.

This procedure is a part of the internal Disposal Manual and therefore primarily designed for Australian Archives appraisal staff. However, interested government agencies and private companies can obtain copies simply by approaching their local office of Australian Archives. Because of the primary focus of the procedure and with the obvious need to reach a wider audience we will be, over the next 12 months, producing a booklet for agency staff on the appraisal of ER and pamphlet on archival issues specifically targeting people in the systems and computer fields.

The focus of future developments relating to ER will concentrate on raising the profile of archival issues within the information technology industry and working toward the establishment of ER standards for data retention. Within the government we will be establishing contact with and seeking representation on information technology committees co-ordinated by the Department of Administrative Services, Purchasing and Sales Group and the Department of Finance, Information Technology Group. Within the archival community we will be seeking to participate in and/or co-ordinate forums and seminars under the auspices of the A.C.A. and A.S.A. We are also in contact with and monitoring developments in the national archival institutions of U.S.A., Canada and the U.K. as well as through U.N.E.S.C.O.

DELEGATION OF THE POWER TO AUTHORISE DISPOSAL

Until November 1989 the power to authorise the disposal of records under s.24 of the Archives Act was held exclusively by the Director-General of Australian Archives. This means that, in effect, all disposal authorities were produced in Regional Offices, and checked for consistency at several levels in the organisation (in particular detail in Central Office) before finally landing in the in-tray of the Director-General. The process of checking against standards, and the centralisation of authorisation itself, arose from a time when there was a lack of detailed procedures and guidelines. Checking was a means to counter the variations in the standard of presentation of disposal authorities and the lack of guidance on making disposal decisions. Over recent years this situation has changed with many of the standards and methods relating to the appraisal of records being codified and refined.

By delegating the power to sign and issue disposal authorities to senior staff in Regional Offices we have achieved savings and benefits in a number of areas. Of significance is the greater client responsiveness we have been able to achieve. Our client agencies no longer have to deal with a number of people from different offices within the Archives in relation to one project. In addition, Regional Office staff have greater

responsibility for the total final product. An aim of delegation was also to decrease delays in establishing authorised disposal arrangements for agencies. The resources which were being utilised in several levels of checking that took place before delegation have also been saved or re-directed. It will be important to assess the effects of delegation as time passes and maintain standards through guidelines and the exchange of information.

CONSULTANTS

Increasingly Commonwealth government agencies are using consultants for a variety of services which in the past they performed themselves. Sentencing, appraisal and storage of records are areas where private companies are beginning to offer services to public agencies. Sometimes this is a cost effective solution. However, there are a range of issues which need to be addressed by the hiring agency in the selection of a consultant and the contractual arrangements regarding the service to be provided. For example, the consultant may be dealing with personally sensitive or confidential information in the course of appraising or sentencing records. The physical and intellectual protection of that information would need to be addressed in the arrangements between the parties.

In the Commonwealth arena, the Australian Archives expects to provide ongoing advice to agencies on the responsibilities and the standards consultants should meet. Some of the work to be performed by consultants will also require ultimate approval by the Archives. For example, an appraisal project leading to a draft authority will still require the approval of the Archives. It is expected that in such a case there would be direct consultation between the agency, consultant and the Archives. Some initial advice to agencies on engaging consultants has been issued. In the next 12 months we expect to examine the feasibility of accreditation or registration of consultants, particularly in the appraisal field.

DIRECTIONS AND INITIATIVES IN THE PERSONAL AND CORPORATE RECORDS SERVICE

The Records Evaluation and Disposal Program has responsibility for the Personal and Corporate Records Service. Through this Service, the Australian Archives aims to collect the personal records of people who have been closely associated at a senior level with the Commonwealth government. Our holdings include personal records collections of Governors-General, Prime Ministers, Federal Parliamentarians, senior public servants and other senior office-holders. We also provide a records service to some organizations which are not, or are no longer, part of the Commonwealth government, but which have close links with it. The

records of these persons and organizations often complement the official record by throwing additional light on the events recorded and on the personalities who took part in these events.

In 1990/91 we plan, within the limits of our resources, to improve both the scope of our holdings and the quality of our Service. We are producing a brochure, aimed mainly at Ministers and other Federal Parliamentarians, which describes the Personal Records Service, and a series of leaflets, aimed mainly at Parliamentarians' staff, which explain how to use it. We will use these publications to ensure that Parliamentarians are aware of the Personal Records Service, and as a basis for advice and training offered to their staff.

FOOTNOTE

1. T. R. Schellenberg, *Modern archives: principles and techniques*, Chicago: University of Chicago Press, 1956. p. 151.