

The National Archives of Australia's New Approach to Appraisal

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This article examines recent changes to appraisal and disposal policy and procedures introduced by National Archives of Australia for use in the Commonwealth government. It looks at the background to the adoption of AS 4390 as the principal appraisal methodology and how the NAA is interpreting aspects of AS 4390 in conjunction with the NAA's roles of regulating disposal and selecting national archives.¹

Introduction

The National Archives of Australia (NAA) is responsible for overseeing the recordkeeping of Australian Commonwealth government departments and authorities (referred to as organisations in this article). The NAA selects and manages the archives of the Commonwealth government, and its permission is required for the disposal of Commonwealth records. The NAA is established under the Commonwealth *Archives Act 1983*.

In April 2000, the NAA introduced changes to its approach to records appraisal and to the basis for the retention and disposal authorities it issues. Details of the new approach are contained in two publications. The first, *Why Records Are Kept: Directions in Appraisal* outlines the appraisal framework the NAA has adopted and its new objectives and criteria for the selection of records as national archives.² The second, *Appraisal Guidelines for Commonwealth Records*

describes the appraisal methodology and sets out requirements for the preparation of disposal authorities.³

The NAA's new approach emerged from policy decisions, made in late 1998, to tie aspects of appraisal and disposal in the Commonwealth to Australian Standard AS 4390-1996, *Records Management* and to base classes in disposal authorities more directly on the functions that organisations undertake.⁴ The standard itself is a voluntary code of practice that can be applied and interpreted flexibly. The NAA had endorsed AS 4390 for use by Commonwealth organisations when it was released in 1996.

The shift from endorsing the standard to tying aspects of it to appraisal and disposal policy is significant. It signalled that the NAA's support for AS 4390 was strong enough to make it, in effect, mandatory in relation to the disposal of Commonwealth records – an area in which the NAA strives to protect its authority.⁵ It also implied acceptance of the AS 4390 approach to functional analysis and integrating appraisal into an holistic approach to recordkeeping.

At the time, there was concern that few staff in the NAA and organisations were conversant with this new style of appraisal. The NAA undertook to develop guidelines. However, within the NAA staff had differing views of how a functions-based approach to appraisal might be interpreted and implemented. Functional appraisal was viewed by some as a high-level analytical exercise that would simplify decision-making and reduce bulk. Others saw functional appraisal as involving a rigorous analysis by organisations of their functions and activities to provide a framework for identifying and assessing recordkeeping requirements generally. What was clear was that, if the NAA was going to implement its policy decisions, it needed to adopt a particular line on interpretation of both the standard and functions-based appraisal. Moreover, the NAA had to find a way to integrate its liberal views on the allowable bases for selecting records for preservation in its archival collection.

Background to the changes

Several factors influenced the NAA's decision to change its approach. The NAA thought that its existing appraisal system was outmoded. It wasn't a mass appraisal approach based on the actions of government in the mould of the Netherlands' PIVOT project. It wasn't a planned, macro-appraisal approach after the fashion of the National Archives of Canada. Nor was it a coherent strategy to document society.⁶ When viewed in terms of the holistic recordkeeping approaches then being espoused in the Australian recordkeeping community the existing appraisal system was only partial.⁷ The existing system focused on setting retention periods, often only after records

had ceased to be needed for administrative use. The impetus for gaining disposal coverage was often an accumulation of records putting pressure on storage space even though the resulting disposal class could continue to be used for records created subsequently. Also, the basic unit of the disposal authority, the disposal class, was not necessarily derived in a uniform way. The NAA believed the system was incapable of being adapted to cover the appraisal of creation, capture maintenance and other needs as indicated by modern recordkeeping theory. For these purposes a new model was required, one that had the capacity to centralise relevant information about the range of requirements affecting decisions to create and maintain records before and during administrative use, and beyond. AS 4390 was seen to offer an appropriate framework upon which the NAA could build, to take account of its roles as the Commonwealth government's archival authority.

The NAA, in any case, wanted to more actively promote good recordkeeping within the Commonwealth government where the overall standard of current recordkeeping was regarded as poor.⁸ AS 4390 was widely recognised by Commonwealth records managers and it had considerable status in that it was an existing Australian Standard. The NAA had been cooperating with the State Records Authority of New South Wales on the development of a manual based on the basic methodology of AS 4390 for designing and implementing recordkeeping systems – the *DIRKS Manual*, which was released as an exposure draft in February 2000.⁹

The NAA also thought that the existing appraisal and disposal system was ineffective. Too many records of doubtful quality were being retained indefinitely, and the volume of permanent records transferred to the NAA each year in the ten years to June 1998 averaged over 12,700 shelf metres.¹⁰ Comparisons with the holdings of comparable national archival institutions showed that the NAA's holdings were disproportionately high. As the NAA believed that the great majority of Commonwealth records were already covered by disposal authorities (many of which were issued on a continuing basis) the options for economically viable reduction of volume were limited.¹¹ Checking the accuracy of existing sentencing decisions, already an issue of general concern, was one option, but a different appraisal approach with different criteria was preferred as a long-term solution.

Research and display values had been the main criteria under which records could be retained permanently. The research value criterion, in particular, was regarded as problematic for its vagueness, and its application was considered to have been a major contributor to over-retention.¹²

In response to this situation the NAA, in December 1998, suspended existing disposal authorities that prescribed long-term or permanent retention until

they were either confirmed as appropriate or replaced by new functions-based authorities prepared using a new approach. It also embarked shortly after on a comprehensive appraisal of common administrative functions using the methodology of AS 4390. The functions concerned were those referred to in the *Keyword AAA Thesaurus of General Terms* which the NAA had recently reviewed and endorsed for use by Commonwealth organisations.¹³ The resulting disposal authority, the *Administrative Functions Disposal Authority* was issued early in 2000.¹⁴

Outline of the new approach

Given this background, what sort of appraisal model has the NAA adopted?

The guiding principles are that records should be created where evidence of business activity is required, and maintained for as long as they are reasonably required. It is expected that records will be disposed of promptly when the risks of disposal are acceptably low.

The NAA wants appraisers to take an organisation-wide perspective to maximise coverage, reduce duplication of effort, allow better definition of functions, and ensure that the range of internal (business) views on the need for records is considered. The interests of external stakeholders in maintaining or disposing of records also need to be considered and, where possible, articulated in terms of the specific recordkeeping actions which would satisfy those interests. Appraisers are asked to analyse the consequences of not meeting identified requirements or interests.

By late 1998 the NAA had concluded that, for the immediate future, it would not attempt to make retention and disposal decisions on the basis of a comparative analysis of the significance of all Commonwealth government functions. Despite the attraction, from an efficiency angle, of making sweeping retention and disposal decisions at a broad level the NAA, on balance, regarded such an approach as too blunt, difficult and controversial.

Instead, the NAA preferred a model under which all the functions of government organisations would be subject to ongoing, systematic assessment of the need for records. Under this model, which accords with that of AS 4390, the functions and activities organisations perform provide the framework for appraisal research, documentation and decisions. The function-activity relationship is the default basis for the retention/disposal class. Accordingly, greater emphasis than before is being placed on systematic research to identify and define each organisation's functions and activities.

The set of functions that an organisation performs constitutes the potential scope for disposal authorisation. This is one reason the NAA is seeking the

development, by organisations, of comprehensive business classification schemes. Another reason is that business classification schemes, a central plank of AS 4390, can be used for a range of recordkeeping purposes. For example, organisations can link approved maintenance and disposal arrangements as well as creation, capture and other arrangements to current recordkeeping systems using a compatible classification scheme and appropriate technology. This facilitates sentencing from creation. Finally, developing comprehensive classification schemes assists in defining appropriate boundaries for functions and activities if they are to be used as the basis for controlling disposal.

Because of the role that business classification schemes may play in classifying, naming and sentencing records for disposal, the NAA treats them as an important part of the disposal system and takes an interest in their preparation.

While comprehensive appraisal of and disposal cover for all functions of an organisation is considered the ideal, the NAA accepts that this may take several years to achieve and is prepared to authorise disposal in relation to individual functions. Apart from common administrative functions, the NAA has not sought to identify and impose, for appraisal purposes, a set of functions for the Commonwealth jurisdiction as a whole, as one might perhaps expect of a top-down approach. This is because of the importance that the NAA currently attaches to organisations developing recordkeeping arrangements for functions and activities that they identify through analysis of their own business processes.¹⁵ The functions and activities that organisations identify will therefore reflect particular structural contexts, although it is expected that many functions, with the recordkeeping arrangements determined for them, will transfer basically intact to new organisational structures following administrative change. As the coverage of functions-based disposal authorities increases, it should be possible for the NAA to take a broader perspective on government functions and compare arrangements for different organisations operating in the same field.

The NAA's new approach to appraisal picks up many of the ideas of AS 4390 about how a compliant organisation should behave in regard to recordkeeping. According to AS 4390, a compliant organisation should 'identify the requirements for evidence, including legal and public obligations affecting each business function, activity and transaction that must be satisfied through recordkeeping'.¹⁶

The methodology AS 4390 describes for this includes:

- a preliminary investigation to 'identify and document the role and purpose of the organisation, the organisational structure, the

organisation's legal, regulatory, business and political environment, critical factors affecting recordkeeping, and critical weaknesses associated with recordkeeping';¹⁷

- analysis of business activity to 'identify and document each business function, activity and transaction; establish a hierarchy of business functions, activities and transactions, that is, a business classification scheme; and identify and document the flow of business processes and the transactions which comprise them';¹⁸
- identification of recordkeeping requirements to 'identify the requirements for evidence of each business function, activity and transaction which should be satisfied through recordkeeping'. These recordkeeping requirements are assessed, using risk assessment, and documented.¹⁹

Each step involves collecting of information from documentary sources and interviews.

The NAA's appraisal methodology is very similar, and its guidelines describe how the appraisal process should be conducted using a top-down analytical approach within an organisation. It is not necessarily assumed that records already exist.²⁰ If starting with a known accumulation of records, however, the key elements of the approach are the same although they may need to be adapted according to the circumstances of the case. For example, appraisers identify and research the creating organisations and their successors, the functions documented by the records, and any recordkeeping requirements that may have applied in the past, or which currently apply. It is possible to discount requirements or interests that have expired and concentrate on any remaining interests that stakeholders have in older records. If equivalent records are no longer being created because the function has ceased or altered, investigating the full range of requirements for creation, filing, form and content may be of limited value for deciding retention and disposal issues.

Although AS 4390 compliance requires documentation of analyses to be produced, the form and content of this documentation is not specified in any detail in the standard. The NAA considered leaving decisions about documentation up to individual organisations, but was not completely comfortable where disposal matters were concerned. The NAA wanted there to be reasonable consistency between organisations to facilitate the processing of proposals for disposal. Representatives of organisations also suggested that it would be helpful if the NAA could include templates in the *DIRKS Manual* and appraisal guidelines to record the results of analyses.

The NAA accordingly identified forms that appraisers may use to document organisational context, individual functions, stakeholders' interests and requirements, the results of risk assessments and recommendations for maintenance or disposal of records.²¹ Documentation of each of these aspects of the appraisal process is explicitly required or implied by AS 4390. However, the NAA's desire to have information linked clearly, where possible, to the particular functions and activities to which it relates has caused concern about the volume of documentation that this may entail.

In some cases, appraisers may feel they need to provide more or different information. The forms may be adapted, although the NAA expects alternative documentation approaches, for example, those using database or spreadsheet applications, to cover the same areas. The documentation will help to demonstrate to organisation management and the NAA that the appraisal process has been conducted systematically and to the required standard. The NAA, in particular, needs evidence that recommendations for disposal have been derived from, and are consistent with, the results of appropriate research and analysis, and that the interests of relevant business, accountability and community stakeholders have been considered.

Decision-making and criteria

Under AS 4390, organisations determine the need for records to be created and captured into recordkeeping systems according to their own needs and operating environment. Determining how long records should be maintained, whether for records already in existence or for those yet to be created, comprises analysis of internal business needs or uses and evaluation of the interests of other stakeholders using risk assessment.²²

AS 4390 does not prescribe a fixed set of evaluation criteria: the predominant message is to make decisions based on an assessment of the risks of having incomplete records and the risk of failure to satisfy requirements or stakeholders' interests. Recordkeeping decisions should be made in the light of knowledge of the organisation's business needs, accountability requirements and community expectations. The underlying principle seems generally to be that high risks should correlate to more comprehensive and better recordkeeping.

The NAA took the view that risk management was an appropriate tool for appraisal purposes. For example, risk management can be used to assist in choosing which functions should be appraised first and therefore be better protected through good recordkeeping. It can also assist decisions at a detailed level about the need for particular records.

The Australian/New Zealand Standard *Risk Management AS/NZS 4360:1999* refers to the need to develop evaluation criteria against which risks will be assessed.²³ The NAA knew that risk management in relation to records appraisal had to take into account the values that applied in Commonwealth government administration. In the Commonwealth this meant that, when taking decisions, organisations should not only consider the risks to the organisation itself but also the risks to stakeholders who may be affected by the decisions.²⁴ The Australian Law Reform Commission in its review of the Archives Act 1983 and the results of the NAA's own interaction with government organisations and members of the public in regard to appraisal also confirmed that people felt strongly about being consulted and having their views taken into account, even if they were not pleased with the decision ultimately taken.²⁵ The NAA's new appraisal policies and guidelines emphasise the importance of considering stakeholders' interests and consultation.

The NAA has indicated how it will interpret AS 4390's three broad areas of business needs, accountability requirements and community expectations in the website version of *Why Records Are Kept: Directions in Appraisal* to provide a reference point for assessing risks. Essentially, the NAA will regard business needs as an organisation's need for records to support the efficient and effective performance of its operational and housekeeping functions. Accountability requirements will be those that arise from an organisation's legal or formal obligations to make, keep, or retain records; requirements imposed by stakeholders such as recognised controlling, audit or monitoring authorities; and standards or codes of practice to which an organisation subscribes. Community expectations will be interpreted as widely held views of acceptable or appropriate practice in relation to recordkeeping at the time of the appraisal.²⁶ For each area the NAA has identified its expectations and requirements of organisations in relation to records creation, capture and maintenance and disposal. These expectations and requirements may be considered as a set of general criteria. As well, the NAA has formulated objectives and criteria for the selection of national archives.

The NAA does not expect that appraisers will necessarily go through each possible criterion, like a checklist, and make a written comment. Rather, it trusts that appraisers will familiarise themselves with the criteria and focus on those that are relevant to the particular case in hand. Awareness of the stakeholders through research and consideration of their interests will shape the appraisal and, consequently, the retention periods that organisations recommend.

Applying risk management techniques to appraisal decisions can be a complex exercise when all relevant factors are taken into account. Not every

situation will need full risk assessment because there will be some agreement of views. The NAA has recommended thorough risk assessments be done mainly where stakeholders have conflicting views about the need for records or where there is uncertainty about the implications and feasibility of certain courses of action. If organisations wish to broaden the range of matters assessed it would still be desirable for them to identify and sift out minor acceptable risks and concentrate on the major risks.

In its role of selecting records for retention as national archives, the NAA sees itself as a stakeholder with certain objectives. While some organisations may consider that there is little risk in not meeting this interest of the NAA, the NAA's close involvement in approving disposal and its capacity to monitor recordkeeping practices places it in a good position to ensure that its objectives are met. The NAA itself has stakeholders, such as public user groups, who may influence the NAA's policy objectives and decisions.²⁷

While the NAA encourages organisations to nominate the records they think should be retained as national archives, the NAA accepts that it must take major responsibility for this aspect of the appraisal and does not formally require organisations to make recommendations using the NAA's selection criteria. However, the NAA may consult the organisation or any other party to assist in its deliberations.

After assessment of its own operating environment, including consideration of the responses to its September 1998 discussion paper, *Making Choices: Deciding which Commonwealth Records to Keep for Posterity*, the NAA settled upon five objectives for identifying records to be retained as national archives.²⁸ These objectives were intended to replace the research value criterion and to provide a sufficient reason for retention that could withstand periods of low use and those who might consider low use a justification to dispose.

The first four objectives relate to the context: 'Governing Australia and its people', which the NAA regards as the principal context it should use for shaping and developing its collection. The records identified under these objectives, together, should provide an adequate account of the activities concerned, the authority under which they were carried out by the Commonwealth and Commonwealth institutions, how implementation was effected, who was involved and affected, and the nature and extent of the outcomes. At one level, the NAA is documenting aspects of Commonwealth activity through the records produced, at another level, by organisations documenting their activity.

The fifth objective takes into account the significance that records may have in other contexts. This objective was included to recognise that the NAA has a broader social and cultural role than documenting Commonwealth government activity and that there are sometimes reasons for retaining records other than as evidence of that activity. The NAA thought that it was important to recognise this point up-front, rather than treat such retention as an operational exception. In addition, some types of records may be kept because it is evident that the Australian community holds them, or the information they contain, in high esteem.

In relation to the first three objectives at least, the NAA would expect organisations to create, capture and maintain adequate records through the implementation of compliant recordkeeping programs. Other factors being equal, the NAA intends to give preservation priority to records that are technically good records; that is, they are complete, reliable, authentic and accessible. All records will need to have adequate information about their organisational, functional and recordkeeping contexts.

Selection objectives

- 1 To preserve concise evidence of the deliberations, decisions and actions of the Commonwealth and Commonwealth institutions relating to key functions and programs and significant issues faced in governing Australia
- 2 To preserve evidence of the source of authority, foundation and machinery of the Commonwealth and Commonwealth institutions
- 3 To preserve records containing information that is considered essential for the protection and future well-being of Australians and their environment
- 4 To preserve records that have a special capacity to illustrate the condition and status of Australia and its people, the impact of Commonwealth government activities on them, and the interaction of people with the government
- 5 To preserve records that have substantial capacity to enrich knowledge and understanding of aspects of Australia's history, society, culture and people

The objectives were deliberately framed to emphasise the point that the NAA wants its collection to comprise high-quality records that document significant matters. The interpretation of the objectives is likely to reflect this.

In regard to the first objective, the NAA will focus on national issues. For the second objective, it will try to ensure that there are sufficient records to show which organisations were responsible for administering government programs and the legal bases under which they operated. The third objective will be interpreted firmly, and the NAA will closely question the need to retain whole series of individual case records under the fourth objective.

The NAA will want to preserve records for reasons unrelated to their functional context in some cases. In regard to the fifth objective, the NAA will select only those records that it is convinced have the highest levels of historical, social, aesthetic, scientific, research or technical significance. The NAA is prepared to receive and consider significance assessments by appraisers and stakeholders as to the significance that Commonwealth records may have in any context.

This is not to suggest that Commonwealth records that do not meet these criteria must always be destroyed, just that the NAA may decide not to manage them as part of its collection of national archives. The NAA, along with other Australian State and Territory Archives, is presently investigating the issues involved in transferring the custody or ownership of government records to private organisations.

The managements of each organisation are responsible for authorising the range of recordkeeping actions recommended through the appraisal process. Any actions that involve records disposal need to be referred to the NAA for approval. Many organisations prefer to obtain continuing authorisation so that records may be classified and sentenced from the point of creation.

The NAA will review the retention and disposal recommendations submitted by organisations along with any significance statements received.²⁹ It will assess the degree to which the records concerned would contribute to meeting any of the five selection objectives, seeking advice from people expert or knowledgeable in the relevant field as necessary. Final decisions will be made by staff of the NAA who are specifically authorised to perform this role.

For disposal authorisation purposes, the NAA will decide disposal action in relation to a whole function or a function-activity relationship where possible. However, in many cases disposal action will be determined in relation to particular types of transaction or categories of records that occur within the function. There is no firm rule about the level at which a decision should be

made, although NAA staff have shown a preference for decisions to relate to fairly specific units.

If a decision is made that records should not be retained as national archives, and assuming that organisational requirements for retention have been or will be worked out separately, the NAA will consider the risks of not meeting the interests of its stakeholders. These stakeholders may include the government and government organisations (who might have nominated records as national archives in the first place) and public user groups.

If the records to be retained constitute only a portion of those that document a function, activity or type of transaction, the NAA will have to assess the options for practical implementation. Depending on the proportion of records involved, the two main options would be to maintain all the records of the function, activity or type of transaction concerned, or to try to isolate and preserve just the target records. It is likely that each case will be determined on its merits.

Implementing this new approach to appraisal will be a challenge for the NAA and organisations alike. The outline of the methodology will be familiar to many appraisers, yet few may have practical experience in defining functions and activities, identifying stakeholders and using risk management techniques in relation to a range of recordkeeping issues.

Although the methodology is demanding and resource intensive if applied to the fullest extent, there are benefits in establishing a sound, documented knowledge base about the factors that do or may affect decisions about an organisation's recordkeeping. Furthermore, there is scope to apply the methodology, strategically, to particular functions according to need and available resources.

In the early stages of implementation, the NAA will be closely involved with organisations to offer guidance and to monitor progress, as well as to make decisions about which classes of records should be retained as national archives. The NAA plans to review its appraisal guidelines later this year.

ENDNOTES

1 My thanks to Adrian Cunningham, Kathryn Dan, and Colleen McEwen at NAA for their comments on an early draft.

2 National Archives of Australia, 'Why Records are Kept: Directions in Appraisal', 2000 at www.naa.gov.au/recordkeeping/disposal/why_keep/intro.html.

3 National Archives of Australia, 'Appraisal Guidelines for Commonwealth Records', 2000 at www.naa.gov.au/recordkeeping/disposal/appraisal/intro.html.

4 Standards Australia, Australian Standard AS 4390 – 1996, *Records Management*.

5 Australian Law Reform Commission, *Report No. 85, Australia's Federal Record: A Review of the Archives Act 1983*, Sydney, 1998, p. 130, para 10.9. Also Australian Archives, *Submission to Australian Law Reform Commission on Issues Paper 19*, April 1997, pp. 44–45.

6 The NAA had studied these and other approaches to appraisal in the period leading up to the 1998 policy decisions, but particularly the work of the PIVOT Project, Terry Cook and Helen Samuels.

7 The records continuum approach was promoted heavily within the NAA in the late 1990s. See, for example, F Upward, 'Structuring the Records Continuum' in *Archives and Manuscripts*, vol. 24, no. 2, November 1996 and vol. 25, no. 1, May 1997.

8 See ALRC Report, 1998, para 9.7.

9 National Archives of Australia, 'Designing and Implementing Recordkeeping Systems: Manual for Commonwealth Agencies' (exposure draft), 2000 at www.naa.gov.au/recordkeeping/dirks/dirksman/dirks.html.

There was, and is still, an intention to align the NAA's appraisal methodology closely with the early steps of the DIRKS methodology, ie Step A – Preliminary investigation; Step B – Analysis of business activity; and Step C – Identification of recordkeeping requirements. However, early drafts of the *DIRKS Manual*, which was being developed in parallel with the NAA's appraisal material, were thought not to account fully for NAA's regulatory role in the disposal of Commonwealth records, nor place sufficient emphasis on those interests of stakeholders which did not already exist as formal requirements.

10 Figure derived from National Archives of Australia and Australian Archives, *Annual Report, 1989–90 to 1998–99*.

11 ARLC Report, 1998, para 10.8.

12 Research value, as part of a set of values-based criteria, had also come to be identified with life-cycle models, which the NAA perceived were under attack from supporters of the records continuum model. The NAA itself officially advocates the records continuum model. See for example the Director-General's foreword in Australian Archives' *Submission to Australian Law Reform Commission on Issues Paper 19*, April 1997.

13 Archives Authority of New South Wales, *Keyword AAA Thesaurus of General Terms*, 2nd edition, November 1998.

14 National Archives of Australia, 'Administrative Functions Disposal Authority' at www.naa.gov.au/recordkeeping/disposal/authorities/GDA/AFDA/summary.html. AFDA was reviewed in *Archives and Manuscripts*, vol. 28, no. 2, November 2000.

15 AS 4390.4, Control, Clause 7.2.

16 AS 4390.3, Strategies, Clause 5.5 (a).

17 AS 4390.3, Clause 6.6.2 (a).

18 AS 4390.3, Clause 6.6.2 (b).

19 AS 4390.3, Clause 6.6.2 (c).

20 Before disposal action is taken, it needs to be verified that the filing practices have actually produced record units that reflect the business classification scheme and can be segregated according to the associated disposal directions. Ongoing quality monitoring is far preferable to discovering wayward practice too late.

21 The NAA expects these forms or adaptations of them will be completed electronically.

22 AS 4390.5, Appraisal and Disposal. NAA staff thought it was odd that there was no reference in AS 4390 to the Australian/New Zealand Standard AS/NZS 4360:1995 *Risk Management*. The adoption of risk management techniques was being encouraged within the Australian Public Service in the late 1990s and it was a natural assumption that, where AS 4390 referred to assessing risks (eg AS 4390.3, clause 5.6 (d) and AS 4390.5, clause 6.4.3), the Australian standard for risk management would provide a sound framework. Applying the framework to complex records appraisal scenarios, however, can be confusing. The NAA has adapted key ideas about stakeholders and their interests and documentation from the risk management standard.

23 Standards Australia: Standards New Zealand, Australian/New Zealand Standard AS/NZS 4360:1999 *Risk Management*, clause 4.1.5.

24 The Australian National Audit Office, in performance audits in 1997 and 1998, had emphasised the importance of stakeholder identification and of considering all risks from the perspective of stakeholders as well as the organisation. See ANAO Audit Report No. 37, *Risk Management, Australian Taxation Office*, June 1997 and Audit Report No. 19, *Risk Management in ATO Small Business Income*, October 1997. See also Standards Australia: Standards New Zealand, HB 143:1999 *Guidelines for Managing Risk in the Australian and New Zealand Public Sector*, Strathfield, NSW, 1999.

25 ALRC Report, 1998, para 6.72.

26 It is unclear to what extent community expectations will be identified in the appraisal process. Stephen Yorke recently discussed the place of community expectations in appraisal in his article, 'Great Expectations or None at All: The Role and Significance of Community Expectations in the Appraisal Function', *Archives and Manuscripts*, vol. 28, no. 1, May 2000. The NAA has provided for community expectations to be taken into account, where they can be identified, and has also indicated that public opinion or pressure may influence appraisal decisions.

27 The Australian Historical Association announced in its *AHA Bulletin*, no. 90, June 2000, that it is forming an archives user group. The NAA sees this group playing a valuable role in representing the views of historians in stakeholder consultations undertaken during the appraisal process.

28 National Archives of Australia, 'Making Choices: Deciding which Commonwealth Records to Keep for Posterity', 1998 at www.naa.gov.au/recordkeeping/disposal/why_keep/choices/choices_intro.html.

29 In some cases, the NAA may initiate records appraisals.