

Will the Tension Ever End?: Some Observations and Suggestions from an Appraisal Archivist

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This article is not a detailed, scholarly re-examination of appraisal theory and methodology. That has been done many times in most records and archives publications over the past twenty years. My article is more a set of observations, looking at a few of the recurring issues in records appraisal that cause tensions between community groups, government archives organisations and government agencies, and how current practice in records appraisal and disposal might offer some opportunities to resolve some of these tensions.

One point of clarification I must make is that I *used* to be an appraisal archivist during my career at the National Archives of Australia. My involvement in records appraisal is now confined to preparing final drafts of appraisal documentation for consideration by the Board of State Records of NSW, and answering any questions Board members may have about those draft

authorities – a different and useful perspective which I will expand on later in this article. I should also add that the following opinions are my own and not the official views of State Records NSW.

Appraisal and disposal initiatives at State Records NSW

State Records NSW (New South Wales) has two fundamental goals for its involvement in the appraisal and disposal of State records:

- to ensure that State records that should be kept as part of the official archives of the State are identified as such (this is part of State Records' archival function), and
- to ensure that public offices retain and dispose of their records as required to meet their business needs, the requirements of organisational accountability and community expectations, as part of their records management programs (this is part of State Records' regulatory function).

In terms of who does what, NSW public offices are responsible for the identification of their recordkeeping requirements; appraising records for which they are responsible to determine how long they should be kept to meet the needs of business, organisational accountability and community expectations; and recommending which records should be kept as state archives (the reality in NSW is that most public offices outsource this work to consultants).

State Records is responsible for ensuring public offices apply best practice in records appraisal; developing general disposal authorities for records common across the NSW public sector; determining which records should be kept as State archives; and authorising the disposal of State records subject to the approval of the Board of State Records.

The Board of State Records is responsible for granting approvals for the disposal of State records. The composition of the Board represents a range of stakeholder interests in both government and the community and State Records may not issue disposal authorisations without consultation with and approval of the Board.

A project (Disposal Process Reform Project) to reform appraisal and disposal in NSW public offices and State Records commenced in February 1999. The purpose of this project is to put in place a planned, systematic and strategic approach to the retention and disposal of records across the NSW public sector.

The reform initiatives are largely informed by current national and international developments in archives and records thinking and best practice. In particular, the reform initiatives are based on developments in functional analysis and functional appraisal as outlined in Australian Standard AS 4290: Records Management, Part 5 *Appraisal and Disposal* and the methodology found in *Designing and Implementing Recordkeeping Systems (DIRKS Manual)*, in particular the first three steps in the Manual: A - Preliminary investigation, B - Analysis of business activity, and C - Identification of recordkeeping requirements.

The *DIRKS Manual* provides a rigorous and comprehensive way of researching and determining what an agency's business requirements are through analysis of functions, business activities and recordkeeping requirements. State Records will base the administrative and business requirements of records appraisal on the DIRKS methodology. What is now required is a similar level of comprehensive and detailed guidance, below the appraisal policy level, for determining the archival values of records.

The State Records draft appraisal policy, which has been drawn from the National Archives of Australia policy, contains a number of objectives that will provide a framework for the conduct of records appraisal in the NSW public sector and establish fundamental objectives to guide the identification of State archives. The appraisal principles in the draft policy are:¹

Objective 1

To identify and preserve records providing evidence of the deliberations, decisions and actions of the New South Wales Government and public sector bodies relating to key functions and programs and significant issues faced in governing the State of New South Wales.

Objective 2

To identify and preserve records providing evidence of the source of authority, foundation and machinery of the New South Wales Government and public sector bodies.

Objective 3

To identify and preserve records providing evidence of the legal status and fundamental rights and entitlements of individuals and groups essential for ongoing functions of the State.

Objective 4

To identify and preserve records substantially contributing to the knowledge and understanding of the society and communities of New South Wales.

Objective 5

To identify and preserve records that contribute to the protection and well-being of the community or provide evidence of the impact of government activities on the condition of the State, its people and the environment.

These objectives, like the ones found in the National Archives of Australia's *Why Records Are Kept – Directions in Appraisal*² demonstrate an attempt to better define and clarify what we are keeping and why. The objectives will be expanded further in State Records' appraisal and disposal guidance and procedures to provide advice on how the objectives should be interpreted and implemented. While these objectives should provide a useful framework for records appraisal I would argue that it is in the interpretation and implementation of appraisal policy that tensions and frustrations arise.

Issues that cause concern in records appraisal

Throughout the eleven or so years I have been involved with records appraisal a number of concerns about the appraisal process have been raised consistently by records users, archivists and other records professionals and representatives of government. Some of the more prominent concerns can be summarised as:

- lack of consultation with records users in the appraisal decision-making process;
- who decides what in the appraisal process and whether they are best placed to make those decisions;
- lack of definition and vague interpretation of the 'value' of a record in relation to secondary informational and research uses. This includes the dubious use and interpretation of appraisal 'qualifiers' such as 'significant', 'major', 'precedent', 'controversial' and 'routine' that lead to an imbalance in the historical record that is kept in relation to important policy development versus policy and program implementation (or more practically put: prominent, controversial, celebratory versus routine and everyday) especially in relation to case and correspondence files;

- concern over retention and accessibility responsibilities for electronic archives in a distributed management environment; and
- lack of storage space and use of new technology as justifications for keeping less or more records.

It is the first three issues that I want to expand on now.

Lack of consultation with records users

For as long as I have been in the profession there has been an ongoing plea from historians, academics, genealogists and other users of records for some sort of involvement in decision-making in records appraisal. Archivists have put forward a number of justifications opposing this suggestion. They include a lack of representation of the wider community by specialised interest groups such as historians; unwieldy administrative burdens resulting in appraisal projects not being finished or dragging on due to ongoing input and conflicting feedback; and that archivists are the people professionally trained to make such decisions.

The first thing that strikes me about these justifications is that they have almost never been tried and tested in any sort of planned or systematic way. Therefore it is difficult to assess how beneficial or impractical they may be.

During the last few years State Records has moved to functions-based appraisal as a preferred methodology and this has resulted in fewer but larger agency-wide records disposal authorities. This year State Records outsourced, to Provenance Consulting Pty Ltd, the development of a general disposal authority and thesaurus for Local Government in NSW. The project involved undertaking the first three steps of the DIRKS methodology. This included doing a functional analysis of Local Government, the development of a business classification scheme and then, the development of a disposal authority and thesaurus.

Local Government produces some of the most important and interesting records that document interaction and interface between individuals, community and regional groups, and government. The project was large, difficult and complex and involved very widespread and thorough consultation with almost 200 councils and approximately 30 stakeholder groups who were associated with or had a stake in Local Government records. Provenance undertook numerous visits and seminars across the State to promote discussion and gather as much feedback as possible. All significant drafts of the authority were placed on State Records' website for comment and input, and the draft was sent to community history stakeholder groups

such as the History Council, the Historian for the City of Sydney, the Royal Australian Historical Society, the Society of Australian Genealogists, and the Sydney City Council Archives.

The results of this exercise were interesting. Firstly, the project kept to deadlines and didn't get out of hand or become delayed because of contentious opinions. Secondly, most of the above-mentioned community history groups provided useful comment and input that resulted in re-examining many classes of records to either reassess their status as State archives or to provide a more balanced picture of policy and program implementation, particularly in relation to regional, local or specialised programs.

The point I would like to draw from this example is that I believe it is possible to invite planned and well-managed input to the appraisal process from stakeholders and gain some real benefits that might just result in a better final product. I have no doubt that this is the case with the NSW Local Government General Disposal Authority.

As part of its recordkeeping standard setting and regulatory role, State Records has the legislative mandate to create recordkeeping standards which are mandatory for all NSW public offices. Examples of these standards include those on Full and Accurate Records and Records Management Programs. The State Records Act states that State Records are to consult with public offices on any proposed standard or code of best practice including giving notice in the NSW Gazette of the availability of such standards and codes. In addition to this legislative requirement, State Records undertakes widespread consultation through our website, focus groups, forums, mailouts and newsletters through the development of any standard.

I would regard a records disposal authority issued under the State Records Act as no less a legislative instrument than a recordkeeping standard issued under the same Act and therefore no less worthy of consultation. Although State Records consults closely with public offices affected by disposal authorities, initiatives could be put in place to ensure opportunities are given to other stakeholders, with the permission of the relevant public office, to provide input on draft disposal authorities. Exposure on State Records' website is an extremely effective and powerful way of communicating disposal intentions to a wider audience. While it can be argued that not everyone has access to the Internet it certainly reaches a wider audience than specialised focus groups, or via a reading room or through newsletters. A system could be easily implemented where people would know or could be made aware of where to go to look at draft disposal authorities.

Having said all of this I still have the strong view that the final decision for disposal rests with the relevant records or archives organisation. I do not think it would be necessary to make every disposal authority available for exposure. I believe, though, that there are benefits to be gained from seeking further comment on large, general, potentially contentious and specialist (those for scientific organisations, health agencies etc) draft disposal authorities. The process can, I believe, be planned, implemented and managed in a way that could enhance the quality of records appraisal and help reduce recurring frustrations of records users. This is particularly important in an organisation such as State Records where 90% of our readers are genealogists.

Who decides what in the appraisal process and are they best placed to make those decisions?

This issue has been a constant concern for all involved in records appraisal and within this issue there are many aspects and questions, such as: Why is the evaluation process so subjective? What experience and educational background do appraisal archivists need to make informed, considered appraisal decisions? What is the role of public offices in the records appraisal decision-making process? How do records consultants figure in the equation? Does their broader experience and skills place them in a position to make more informed appraisal recommendations than public offices or archivists who have only ever worked in a government archives? Are government archivists the only ones who can bring a 'whole of government perspective' to records appraisal? Where are the opportunities for specialist input where appraisal involves records documenting academic or scientific records, for example?

Lynette C McLoughlin in her article 'Environmental History, Environmental Management and the Public Record: Will the Records Be There When You Need Them?' says 'The ultimate appraisal theory seems to be a mirage. Even with guidelines and criteria, the attribution of value to records is subjective, entirely dependent on the framework, ideology, context, training and background of the person(s) making that determination.'³

This article deals with the history of the neglect and destruction of records documenting one hundred and forty years of dredging in the Sydney estuary. McLoughlin argues that under current appraisal regimes these records would not be regarded as functionally important, despite the influence dredging has had on Sydney waterways and that the assessment of the value of the records was lost on appraisal archivists who usually have an arts or humanities background. What was missing in this instance was lack of input from those

who had the scientific background to provide the expertise to give a proper assessment of the importance of these records.

While I believe that appraisal decisions can never be completely objective I would suggest that the magnitude of any particular 'mirage' would be influenced by additional factors such as the level of corporate memory and quality of information received from the creating agency during the appraisal process, the strength and usefulness of appraisal procedures and guidelines and the degree of objectivity and self-discipline of the appraisal archivist.

I don't claim to have self-discipline in abundance myself. I recall undertaking the appraisal of the records of the Australian Broadcasting Corporation; a large, complex and interesting project. During the discussions and interviews with various program areas within the ABC, I remember not even entertaining the idea of keeping any less than all the records of the drama and documentary programs permanently, yet it took enormous convincing to agree to keep only a very small proportion of the records of the religious and sports programs.

On reflection, I suspect the reasons for my heinous behaviour were my inexperience, lack of open discussion with more experienced archivists and others not directly involved with the project, the inability to interpret practically an appraisal criterion called 'research value' (what on earth does that *mean?*), and a lack of rigorous review and evaluation of my work. Most of these problems, with the exception of the vaguely defined appraisal criterion 'research value' could have been solved through implementing a more detailed and accountable project management regime.

We are constantly being reminded that records appraisal is regarded as the most intellectual, difficult and complex task in the profession. I have never seen these qualities acknowledged or inherent in any of the appraisal methodology, procedures or practical project management I have experienced. This is even more of an issue in a computerised systems environment where the iterative and analytical characteristics of records appraisal, if considered, are found too difficult to build into an automated process.

In NSW, most records appraisal is outsourced to consultants to do on behalf of the agency. This is in many ways a good thing. We are fortunate in Sydney as we have a good selection of excellent consultants who bring a great deal of professionalism and experience to their work. I believe they are better placed to undertake this work than agency staff or government archives staff as their experience across many organisations gives them a better perspective of whole of government (and outside government) records and archives issues. This was certainly the case with the Local Government General Disposal Authority exercise undertaken by State Records.

The point I would like to draw from these issues is that I believe no one stakeholder is best placed to make appraisal decisions in isolation, whether that person is an archivist, agency officer, consultant or historian. Apart from the more widespread consultation I suggested in the previous section, I would encourage much more discussion on individual appraisal projects. This discussion needs to be done within the government archives, both with more experienced archivists and others not directly involved with the project who can bring a fresh perspective to thinking. In the case of scientific or other specialist records serious consideration should be given to bringing in appropriate expertise to contribute to a more informed, considered decision being made about the importance and value of these types of records. Relying on the relevant agency to provide this expertise has proven to be inadequate as far as the historical perspective is concerned.

Interpretation of the 'value' of a record in relation to secondary research use

Dr Hilary Golder, historian and member of the Board of State Records NSW said in an article titled 'The Role of Archives in Research Practice Today', 'But I do have a niggling unease about current appraisal philosophies. Records relating to policy formulation are kept without question. And I can see the legal and administrative imperatives here. Records dealing with the implementation of policy are much more problematic. There does not seem to be much room for mundane case files, which do not result in any change to policy. Again I appreciate that there is literally not enough room for all my pet series. The constraints of costs and space are always with us. But I think we should at least be clear about what we are doing and acknowledge the research implications of privileging policy in this way.'⁴

The point to draw from this observation is that the imbalance caused by trying to define and keep only major, significant or precedent policy formulation and implementation records is probably the greatest ongoing tension I have been faced with throughout my appraisal work. Case files and related records are among the most used records in the Reading Room at State Records where 90% of the readers are genealogists. The case files that have survived from the nineteenth century and early this century are some of our most treasured records, giving invaluable insights and histories of communities and demographic and economic change. These are the very records that Dr Golder has used in her study of married women's property and the concept of the marriage contract in nineteenth-century Australia.

Another interesting factor in this conundrum is that with the rise of public programs and other outreach functions within government archives there

has been added support for the 'mundane' record, as it has been found that many of these everyday case records have provided the basis for exhibitions and are the records that people coming to exhibitions want to see – the quaint, quirky, and fascinating documents at the interface between government and individuals. The records that people relate to most readily in exhibitions are those that remind them of events in the history of their everyday lives or that remind them of achievements and tragedies that have affected the lives of Australians. High-level government policy records are not the winners here. How many people outside of political historians and other academics are going to study them, especially in an exhibition environment? I know I would be passing them over to move on the Naturalisation Case File or the Terminated Publicans Licences Files.

Yet, having said this, I can think of no example in government archives in Australia where the issue of why we aren't keeping the records that many people want to use has been thoroughly analysed and discussed with a view to seeing if there is a way of trying to address this imbalance in appraisal methodology and procedures. It is easy enough to keep people happy by addressing the issues in a grand sort of way in the highest level appraisal policy statements but it is the 'how we do it' where the issue becomes vague and muddled. There have been some attempts to keep some case records in the past through sampling techniques and as far as I am aware every example ended in dismal failure through a lack of understanding of the principles and implementation of scientific sampling. More importantly has anyone asked what these 'samples' constitute in the end and, beyond certain scientific and related records, are they of much use to anyone? – my guess is very little use unless genealogists enjoy playing lucky dip with sampled records.

And what about those qualifying words sprinkled liberally throughout records disposal authorities – significant, insignificant, major, minor, high-level, low-level, and so on. What do they mean and how should they be interpreted by those implementing appraisal decisions? Many agency staff request the inclusion of numerous records examples to guide them in making these decisions. Significant and high-level is often linked to the highest levels of management in an agency without thinking of what else might constitute significant or high-level.

One of my duties is to attend meetings of the Board of State Records to answer any questions the members may have about draft disposal authorities or to provide additional information about the appraisal projects. Dr Golder and other Board members have from time to time questioned this emphasis on keeping only the privileged policy records and I must admit there has been more than one Board meeting where I have come away with a niggling feeling

of guilt that our appraisal work is, from time to time, letting people down in relation to policy implementation records. This of course raises the question of what we are, or should, be doing about it.

Over the years there has been much discussion around the issue of policy implementation records and there seems to be a general consensus that we can't keep everything. We acknowledge that the paper explosion from the 1950s on would make keeping all policy implementation records prohibitively expensive. There is also the issue of capturing more, using digital technology to avoid keeping huge amounts of paper records. We don't know what percentage of case and other policy implementation records we need to keep as we have never really asked those who use the records and no thorough analysis of the issue has happened. Where the records have been kept or a previous decision overturned it is often a reactive response to users strongly voicing their concerns, as was the case with the Commonwealth census records.

In conclusion

I would like to suggest that government archives take a more proactive approach with this issue and undertake a thorough analysis of this issue. What is it exactly that we should be keeping in relation to policy implementation records? What opportunities does digital technology and the Internet give us, and what are the costs and other resource implications? What initiatives can we undertake to try and address the concerns of users? Genealogists and historians are among our largest user groups yet they have been traditionally treated with, at best, indifference, or at worst contempt, by those charged with the responsibility of selecting records that are to document this country's history. I believe it is high time we started taking advantage of the opportunities and benefits that can emerge from working more closely together on issues of common concern and interest.

I believe current initiatives at State Records have, in a small way so far, proved that we can be more inclusive with how we approach decision-making in records appraisal. It is time to start extending and formalising that approach into appraisal methodology thinking and attitude. The *DIRKS Manual* gives us a detailed and structured methodology to undertake a thorough regime of research, consultation and analysis before making decisions about an agency's recordkeeping requirements. I believe that a new appraisal methodology based on DIRKS can and should incorporate much of this guidance and structure to revitalise appraisal methodology with the rigour and thinking it requires, as well as providing for more opportunities for wider consultation and discussion throughout the appraisal journey.

ENDNOTES

1 State Records Authority of New South Wales, *Accountabilities and Expectations Draft Appraisal Policy*, State Records Authority of New South Wales, July 2000.

2 National Archives of Australia, *Why Records Are Kept: Directions in Appraisal*, National Archives of Australia, March 2000.

3 Lynette McLoughlin, 'Environmental History, Environmental Management and the Public Record: Will the Records Be There When You Need Them?', *Australian Journal of Environmental Management*, December 1999, p. 213.

4 Dr Hilary Golder, 'The Role of Archives in Research Practice Today', Archives in the National Research Infrastructure, Round Table No. 10, National Scholarly Communications Forum, Canberra, November 1999, p. 4.