

# Access Policies for Corporate Archives

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IN OCTOBER 1978 the Society of American Archivists adopted a set of access standards in an attempt to encourage equitable access practices in all archives and manuscript repositories and to alleviate some of the criticism levelled against the archival profession for its discriminatory policies. Unfortunately, business archives have traditionally been regarded by scholars as secretive and unduly restrictive about access to records; and it seems they have lagged behind the profession as a whole in terms of complying with SAA access standards.

At present, very few corporate archives have formal access policies. Most are still maintained strictly for internal use, and access decisions are left to the discretion of the archivist. This situation can lead to innumerable problems, and criticism from outside researchers can often result in one-sided, negative reporting. The archivist is placed in the vulnerable position of trying to discern "good" scholars and journalists from

"bad" ones. An even greater problem can come from within the company when an archivist is without guidelines or precedents in deciding whether or not an employee from one department can use records from another department.

Quite often, records are deposited in an archives with the stipulation that they be closed indefinitely, or with the unwritten understanding that the archivist will administer them properly. Apart from the personal liabilities involved, the archivist must consider what happens to those records if the office of origin is reorganized, or if the officer who deposited the records is replaced.

Many business archivists argue that they do not have formal policies because they fear drawing attention to sensitive records in their possession. It is true that most corporations today are made wary about their internal records by the numerous cases of litigation brought against them. Rather than ignoring the issue of access, however, it seems all the more important to have a strong protec-

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tive access policy.

The adoption of a comprehensive and equitable access policy alleviates many of the problems addressed above. If outside researchers feel they are being treated fairly, their results may not be so negative. If the policy can be administered equitably, the archivist is not as vulnerable to the consequences of making a bad judgment and may not have to live in fear of seeing his or her name in the acknowledgements of the latest company exposé. If the policy includes reasonable time limits on restrictions, the records are not in danger of being forgotten or closed forever.

Most, if not all, of the SAA Access Standards can be applied to corporate records. While few companies will view their records with the openness that a public library might, business records are not unlike those of a private citizen. Business archivists can and should strive to make available to all researchers, on an equitable basis, those records that have been designated as unrestricted, and to obtain reasonable time restrictions on those records that should be protected.

To achieve the results desired, an access policy should include the following elements: clear descriptions of restrictions, time limits on restrictions, procedures for determining restrictions, and a statement regarding lines of administrative authority.

Assuming that in many cases there will be more than one category of restriction, the first element, definitions of restrictions, should be stated clearly. The following examples are from the Chase Manhattan Bank's policy:

—*Open records* are those which may be made available to employees as well as persons not affiliated with the company. Included are records originally intended for public circulation and other material approved for public release.

—*Restricted records* are those which, though not open to the public, may be made available to employees for business related purposes.

—*Closed records* are those which, for a specified period of time, are available only to the office of origin and the archives staff.

The second major element to be included in an access policy should be time limits on restrictions. Some companies have set 10 years from the time of creation as the limit of closure, with longer periods if necessary. At Chase, records are normally closed for a maximum of 20 years. Exceptions are as follows:

—Records of the board of directors and the executive committee are closed for 50 years.

—Records of such a nature that their disclosure would constitute an invasion of personal privacy or a violation of customer confidentiality, or which might reasonably be expected to prove harmful to Chase, are closed for 75 years.

—Other records may be closed for more than 20 years with the permission of the Archives Council (a review committee whose membership is comprised of senior bank executives including, *ex officio*, the executive for corporate communications, the executive for human resources, the corporate controller, the corporate secretary, and general counsel, as well as the archivist).

The third element of the policy should be clear procedures for determining restrictions. The policy should state when and how restrictions are placed on records (for example: at the time of deposit, the depositing officer, on recommendation from the archivist, will determine the appropriate restrictions).

And finally, the policy should clearly state lines of authority and procedures for obtaining access. Some of the points that should be included are:

—The archivist should be responsible for supervising access to the Archives, and the holdings should be used only under the guidance of the Archives staff.

—A clause should be included to describe how one can obtain access to restricted or closed records.

—Some indication should be given that records will be made available in accordance with archives regulations.

The actual process of writing a corporate access policy and then having it implemented can be a great exercise in corporate diplomacy. The people involved in the process have their own ideas as to what this policy should accomplish. For the archivist, the ideal situation is a policy that clearly outlines authority and procedures for governing access to records, a policy that is equitable for all concerned users, and one that protects the archives while at the same time making the company comfortable about the archives. And most of all, the policy should be easy to administer.

The corporation's legal staff, on the other hand, may prefer a far more restrictive policy that may also prove more difficult to interpret. But this is as it should be; a legal staff exists, in large part, to protect a company against lawsuits—which in its view can arise out of virtually any item of information.

If a corporation decides to maintain an archives, it incurs risks. Some records that are preserved might, at some point, prove troublesome, embarrassing, or harmful to the company. But the positive factors involved in an archival program—even in the area of legal affairs—generally far outweigh the negative ones. There are innumerable cases in which records preserved in an archives have saved a company from hostile litigation, and members of the legal staff have in many instances become the primary users of corporate archives. If a company is willing to support the maintenance of its records, the archivist must be responsible for insuring that proper protection is given to the information those records contain.