

The Appraisal and Scheduling of Government Records: A New Approach by the Australian Archives

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The task facing all managers of government records has become more difficult over the past century. Certainly this is the case in Australia, where the growth in federal government has accelerated rapidly since 1945. The rate of administrative change has also quickened—perhaps to a degree that is unusual even in a federal system—reaching unprecedented levels in the mid 1970s. The sheer size and complexity of modern record keeping in the federal government was a major stimulus for the development and refinement of the Commonwealth Records Series (CRS) System—a method of intellectual control specifically designed to accommodate the records created and maintained in a dynamic administrative context.¹

In the area of disposal, the focus of the present article, some developmental work also took place in the mid 1970s.² The critical importance of the disposal function in controlling the accumulation of commonwealth records was recognized and basic procedural material developed. The real

stimulus to tackling the more fundamental issues at the heart of the disposal process, however, was the passage of the Archives Act in 1983. The act as a whole gave the Australian Archives new and wide-ranging responsibilities for the broad management of all records throughout the commonwealth government. The disposal powers conferred by the act are correspondingly broad in scope. Any practice involving the potential loss of commonwealth information—not only the destruction of records, but also the transfer of custody or ownership of records and the alteration of records—must be authorized by the Australian Archives to become legal and avoid incurring the act's punitive provisions.³ Appraisal—the method of determining the value of records to provide for their proper disposal—thus becomes the critical procedure on which a number of administrative actions depend. It became imperative for the Archives to formalize a systematic, effective, and efficient method of evaluating records and authorizing their disposal, by

¹On the methods for dealing with administrative change developed by Australian Archives, see P. J. Scott, "The Record Group Concept: A Case for Abandonment," *American Archivist* 29 (1966): 493–504, and the series of articles by P. J. Scott, C. D. Smith and G. Finlay, "Archives and Administrative Change: Some Methods and Approaches," Parts I–V, *Archives and Manuscripts* 7 (1978): 115–27, 7 (1979): 151–65, 8 (1980): 41–51, 8 (1980): 51–69, and 9 (1981): 3–18.

²Disposal here has a larger sense than in North America where (at least in United States government usage) it has the more limited meaning of destruction. In the Australian Archives usage the term encompasses the process of deciding whether and how commonwealth records may be *altered*, whether and on what conditions they may be *transferred* to a new custodian or owner, as well as whether they should be *retained* or destroyed.

³Archives Act 1983, s.24. The permission of the Archives is not required where such actions are positively required by another law. A further minor qualification allows those actions to occur when they are "a normal administrative practice" of an agency, provided the Archives does not disapprove of the practice. This common sense provision permits such disposal as occurs in the normal course of public administration (e.g., destroying hand written drafts, opening envelopes, sending correspondence) to proceed without contravention of the Archives Act. A further provision (s.26) prohibits additions or alterations to records over twenty-five years old, unless they are specifically required by another law or effected with the permission of the Archives.

In 1984–85 Beverly Hart and Stephen Ellis were members of a small project team reporting to Ian Pritchard, Director of the Disposal Program in the Australian Archives. The team's brief was to review the Archives' disposal system in the light of the new legislative requirement of the Archives Act 1983.

means of a continuing disposal schedule or alternative form of authority.⁴

To understand fully the particular disposal arrangements established by the Australian Archives, it is necessary to set the Archives Act in a larger context of legal and administrative developments in Australian government over the last ten years. As early as 1927 archives legislation had been considered. It was not until the 1970s, however, that an archives bill was drawn up as part of a wider movement aimed at making public administration in Australia more accountable and responsive. The Archives Act 1983 was passed by the Australian Parliament in tandem with freedom of information legislation. Both acts are part of a substantial body of legislation which also provides for administrative and judicial oversight and review of government operations and decision making.

This body of legislation, which has become known collectively as the "new administrative law," has had a major impact on the commonwealth archives and other federal agencies. Record keeping practices assume a new importance when all agencies are required to provide access to official information, prepare statements of reasons for administrative decisions, and generally conduct themselves in a way which will withstand scrutiny by an interested member of the public or a formal review body.⁵ For its part, the Australian Archives has recognized that its procedures for disposing of commonwealth records must meet the new standards of consistency, efficiency, and accountability. In other words, the Archives saw that the kind of public

scrutiny to which the United States National Archives and Records Administration was subject in the "FBI files case" was a continuing possibility in the new working environment in Australia.

A few words about previous scheduling arrangements and continuing record-keeping practices in the Australian public service should help to put the new procedures recently developed by the Archives in context. At the time of the passage of the Archives Act, individual appraisal projects were initiated either by the Archives or by agencies. In the latter case, an agency would evaluate the records independently and prepare a schedule which was submitted to the Archives for approval. A reappraisal of the records was frequently found to be necessary. This was usually completed by the Archives' regional office staff before a revised draft schedule was submitted for review by the Disposal Section of the Archives' Central Office.

As a general rule in the Australian federal government, the functional divisions, branches, or sections of an agency do not maintain independent record systems—they use the central registry for the agency as a whole. Similarly, staff at different levels of an organization, from the operational service areas through to the senior executive, all rely on the same centralized system of record keeping. In the course of administration, records can thus move horizontally across the various divisions of an organization and vertically through its structural hierarchy. One consequence of this is that some record series, for example, general correspondence file series, can be

⁴ The system of authorization is still being developed. To date it includes the General Disposal Schedules and continuing disposal schedules, authorizing the retention or destruction of records, an "ad hoc" permission to destroy records, and authorities for the alteration of records over twenty-five years old.

⁵ While individual elements of the commonwealth's new administrative law are mirrored overseas, the package as a whole—combining access to information through the Freedom of Information and Archives acts, duty to give reasons for decisions made under statutory powers, and the review of administrative decisions by the Ombudsman, Administrative Appeals Tribunal, and the Federal Court—is a uniquely Australian contribution to the common law world.

very large and cover a wide range of activities.⁶ Individual files within the series may themselves contain papers relating to a number of different functions.

The Australian Archives' system of classifying records for disposal purposes thus starts from the premise that grouping records according to the length of time they need to be kept will not necessarily correspond to the way records are grouped for administrative purposes; the record series and the disposal class will not necessarily coincide. The primary appraisal task is not to apply appraisal criteria to given groups of records in order to determine their value, but rather to distinguish groupings of records which have similar uses and values and can be given the same disposal action. While record series can thus serve as a starting point or "way in" to the appraisal exercise, any given series may yield a number of disposal classes if it is found to embrace a number of uses and values. Conversely, a disposal class may be formed of several record series where these are found to serve the same function and determined to have the same value.⁷

Against this background, then, the task before the Australian Archives in 1983 was to extend disposal coverage to all commonwealth agencies and institute an accountable and efficient method of authorized disposal. As a preliminary, a review team undertook a study which analyzed the Archives' existing scheduling arrangements against the new legislative requirements to identify any shortcomings. The review also took in a comparative study of disposal ar-

rangements overseas and a survey of the professional literature on appraisal and scheduling.

An elaboration of the review team's findings is not possible in the space available here. In general, the existing system was recognized as wasteful. It failed to make effective use of agency personnel and their knowledge of the records; it also incurred considerable duplication of effort by agency and Archives staff at all stages of the process. Under these arrangements the goal of universal disposal coverage for the records of all agencies would indeed have been difficult to achieve.

The problems identified by the review team related to three major areas: management, personnel, and methodology. To take the last first, it was recognized that appraising officers, whether agency or Archives staff, suffered from a lack of material which sufficiently explained the complex process of drafting a disposal schedule. The lack of detailed procedures was compounded by a lack of standardized ways of reporting the results of an appraisal exercise and insufficient direction on the standards being applied in the Archives' Central Office, where draft schedules are reviewed. The absence of clear guidelines and reporting mechanisms both impeded the efficiency of the appraisal project itself and resulted in documentation insufficient to enable reviewing officers to assess adequately the judgments about records that had been made.

In addressing these methodological problems, the team surveyed the literature

⁶ Record series here means a group of records maintained in the same alphabetical, numerical, chronological or other sequence, which usually have the same form, shape, and size.

⁷ These distinctions are worth making because, despite attempts to standardize usage in the international archival community, there continue to be critical differences in the way key terms are employed and understood. Thus, because it contains the notion of like value, a (disposal) "class" in Australian Archives usage is significantly different from the definition of "class" in the ICA *Dictionary of Archival Terminology*. Again, as used by Australian Archives, a "class" is quite different from a record "series," since the latter contains no notion of values and is simply a unit in the system of intellectual control. In contrast, the ICA *Dictionary* indicates that "class" and "series" are generally equivalent terms.

on appraisal and scheduling. Like other recent reviewers, it found that this is an undeveloped area of archival theory, though there are also signs that archivists are beginning to respond to Richard C. Berner's challenge that "a body of appraisal theory is perhaps the most pressing need in the archival field today."⁸ The Australian Archives' team, however, took the view that the problem is not simply—as Berner suggests—that appraisal methodology has not advanced beyond the most "primitive" taxonomic stage, but also that it has concentrated almost exclusively on the WHAT at the expense of the HOW. In a word, it is insufficiently applied.

While the review team would have been delighted to find in the literature a ready-made solution to the problems, in a sense the absence of a well developed methodology was also liberating. Certainly the lack of a model meant that efforts could be directed to meeting the specific needs within the Australian government rather than attempting to apply an appropriated schema that did not quite fit. The experience has, in fact, made the team somewhat skeptical of any claims made for a universally-applicable appraisal methodology and sympathetic to Francis X. Blouin, Jr.'s contrary view that "there is no simple solution to the appraisal problem: appraisal is an inexhaustible issue. There will be no definitive studies."⁹ Blouin's view is that, while no simply stated rules are likely to emerge, our understanding of the problems will be refined by studies of specific organizational problems, record groups, and structural forms. It is in this spirit that the present remarks are offered.

Turning now from methodology to personnel, the review team found that the poor quality draft schedules prepared by com-

monwealth agencies were in part attributable to the junior level and insufficiently trained staff charged with records and archival responsibilities in agencies. These officers frequently lacked the support of senior management when undertaking disposal projects. This factor is not of course unique to Australia, and in canvassing ways of approaching this problem the review team inevitably covered ground that has been crossed in recent international literature, touching on such matters as the lack of well-developed curricula, training, and career paths for records managers and archives officers in government departments. The team recognized that the problem here was a complex one admitting no ready solution.

In an ideal world the work of government archives would be facilitated by professional, career-oriented staff in the records areas of agencies. The absorption of records management areas into higher profile information management programs may make this more of a reality in the future. In the meantime, the review team came to the view that the problems centering on personnel—no less than the methodological difficulties—could be overcome at least in part by better management strategies. Just as well-articulated and systematic work-methods could help officers to manage individual appraisal projects better, so improved planning for and management of scheduling activities as a whole would mean that archives and agencies were more able to work together towards a common goal. Thus, there is a sense in which the Archives has applied management solutions to both the personnel and methodology problems identified in the review of the disposal process. For this reason, "management" was given first placing in the summary of problem areas above.

⁸ Richard C. Berner, *Archival Theory and Practice in the United States: A Historical Analysis* (Seattle and London: University of Washington Press, 1983), 7.

⁹ Francis X. Blouin, Jr., "An Agenda for the Appraisal of Business Records," in *Archival Choices: Managing the Historical Record in an Age of Abundance*, ed. Nancy E. Peace (Lexington and Toronto: Lexington Books 1984), 76.

At this stage a basic working premise should be declared—the more so because it runs counter to some current thinking about ways archivists can achieve true professional status. The premise is that too much can be made of the “judgment of the professional archivist.” The review team accepted that in the Australian federal government agency, officers from general clerical backgrounds have to make the basic appraisal decisions. The Archives’ role is to facilitate and, where necessary, assist that process, and to make sure that all relevant interests have been accommodated and current accountability standards met. Moreover, the review team held that, with better management, officers without formal archival training *could* be guided to make considered judgments about the value of records to the standard required in the new working environment. Analysis of the appraisal-scheduling process had suggested that it is as much an organizational task as an intellectual exercise. The team believed that better disposal decisions would be forthcoming if officers were given a firm structure within which to exercise an informed judgment and a standard way of documenting their reasoning, so that justification for the appraisal judgments would be accessible to any reviewer.

A further explanation of disposal arrangements in national government should be made in support of this view. In Australia, the appraisal process is not divided chronologically into first and second review stages, as in England. Nor, as in North America, is there a division of responsibility between agency and Archives officers on the basis of appraisal criteria, with the former determining administrative and the latter archival values. Rather, in the revised procedures recently established by the Australian Archives, the relative responsibilities of the agency and the Archives are conditioned by the degree of difficulty of any given appraisal project. In brief, agency officers tackle the more simple projects—

those involving series which are likely to yield single or few disposal classes—with minimal involvement from the Archives after the initial planning stage. Agency officers and Archives regional officers work together on the more difficult projects—those involving more complex series which are likely to yield a number of disposal classes. Regardless of the degree of difficulty in the project, all draft schedules (and accompanying appraisal documentation) are reviewed formally by the Disposal Section of the Archives’ Central Office to check their internal coherence and consistency with national standards.

Different kinds of procedural material have been developed for the different kinds of projects, with an appropriate style, level of detail, and technical vocabulary for the target audience. *The Self-Help Appraisal Handbook for Agencies* adopts a common sense approach and aims to minimize the mystique of the appraisal process. The procedure for the more detailed joint Archives and agency projects retains the “plain English” style, but is necessarily more detailed and assumes more background knowledge on the part of its readers. For training purposes, it is assumed that officers new to appraisal work will begin with the simpler projects and graduate to the more complex appraisal tasks.

Both procedures aim to help appraisers manage their projects by providing a step-by-step description of the stages involved in drafting a schedule. They address not only the niceties of the appraisal criteria but also the practical difficulties of organizing heterogeneous and often physically dispersed material into coherent disposal classes. The procedures give concrete advice on locating records and using subject indexes and other control records. They also give tips on how to make best use of human information sources in building up knowledge on the functions and scope of the records.

The very general appraisal criteria established by the Archives Act have been interpreted and applied in a set of questions contained in a "Standard Appraisal Report," which all appraisers must complete. There is an accompanying "How to Complete" section, which directs appraisers to information sources and provides pointers to potential record values, drawing on precedent and policy advice on such matters as best evidence rules and the effects of statute of limitations provisions. Again the objective is to provide appraisers with both a structured work method and the necessary background for informed decision making.

With the overriding concerns of consistency and accountability in mind, the structured work methods also ensure that uniform considerations are brought to bear across a range of disparate projects. All appraisers must complete a "Standard Appraisal Report" for each disposal class in their draft schedule. The procedures advise appraisers how to bring together the information on the value of the records that they have collected, and work towards a fully-supported disposal recommendation. Practical hints are included on such matters as class description, appropriate retention periods, and storage arrangements. Appraisers are also required to complete an "Overview Report" in support of the draft schedule as a whole. This allows them to comment on any important or peculiar aspects of the appraisal project. It also provides vital context and background information for the officer reviewing the draft schedule.

In the revised scheduling system instituted by the Australian Archives, attention to the details of appraisal methodology has been complemented by attention to the larger process of project management. In the past, any insecurities officers may have felt about embarking on an appraisal project were compounded by a generally low level of commitment to disposal work in most agencies. The officers concerned could not always rely on the support of their own

senior staff, and thus frequently lacked the incentive to persist with disposal initiatives. To overcome this problem the Archives, strengthened by its new statutory powers, has adopted a higher profile in its dealings with commonwealth agencies. Appraisal projects are now initiated at more senior levels and do not win a place on the Archives' forward work program unless the agency's senior management has committed resources to a given piece of work. The *quid pro quo* from the Archives is the promise of a fully approved schedule at the earliest specified opportunity.

The Archives is now able to give this kind of guarantee, as the improved planning, management, and work methods have smoothed the passage of draft disposal schedules to and through the central officer review process. Not only are the drafts themselves likely to be a higher quality, but the standard reports and schedules lend themselves to speedy assessment much more readily than the idiosyncratic supporting minutes and personally styled schedules of the past. Advance programming of all stages of the appraisal and scheduling process further minimizes delays, while any problems which are found in the draft schedule at the review stage can usually be dealt with readily, since discussions with the agency are unlikely to be impeded by staff turnover.

A further point about the revised system should make this clearer. In our experience, appraisal projects aimed at covering all the records of a given agency tended to compound any difficulties with a given project. The long lead times maximized the opportunity for errors, staff turnovers, and the poor morale which results from a lack of personal achievement. Consequently, the Archives now limits the size and scope of appraisal projects to a maximum of three months' work. This makes drafting a disposal schedule a more manageable and rewarding task for the officers concerned. Prompt approval of the schedule and its early use are also proving the best incentives to

further disposal projects on the part of the agency. Universal disposal coverage for the records of all commonwealth agencies remains the ultimate objective. This, however, is seen as being best achieved by concentrating effort on those areas in all agencies which maximize the return on effort expended. Thus disposal coverage is being built up incrementally across all agencies, rather than proceeding on an agency-by-agency basis, while within agencies officers are encouraged to tackle large groupings of records where visible results for their work will be most obvious.

This completes the brief summary of recent changes to the system of appraising and scheduling commonwealth records. We recognize that only a start has been made and that a lot remains to be done. The approach taken to date has had an unashamed management bias, with even technical problems being tackled from a work methods and organization point of view. To some extent this bias will continue, since the work-planning and coordination efforts are now beginning to yield results at the local level and the aim must be to get the same spirit of cooperative endeavor between the Archives and agencies working throughout the Australian public service.

It is recognized, however, that not all technical and theoretical problems are susceptible to management solutions. Thus, while resources permit, the Archives is also examining the principles underlying its methodology. To date archivists have nec-

essarily been working with a largely inherited appraisal taxonomy, devised for the most part by Schellenberg (a visiting advisor to the commonwealth Archives Office in 1954), if somewhat developed for local application. Recently, the Archives staff has begun to ask how well adapted these received appraisal categories are to the legal and administrative system which now operates in Australia.

Thus the appraisal criteria is being reexamined to determine their precise meaning, application, and completeness. Arguably, the Archives Act 1983, with its strong emphasis on the preservation of the archival resources of the commonwealth, is weighted towards the continuing value that records have for all citizens.¹⁰ Yet this value must be reconciled with an equally legitimate public interest in the cost of government record programs and larger social issues, such as the right to individual privacy. It is against this kind of background that we the archivists must determine what, for example, the "research" value of records means in practice in the current Australian government context. More importantly, we must convey this understanding to all appraisers.

Exposing the underlying premises behind its procedures is one of the ways the Australian Archives can be accountable in the new administrative environment. Equally vital is that the appraisal and scheduling system adopted should be built upon solid foundations.

¹⁰By contrast, it is arguable that the primacy of evidential over informational values in Schellenberg's system of appraisal can be traced back to the definitions in the enabling legislation of the United States federal archives.