

An Obligation of Trust: Speculations on Accountability and Description

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Abstract

This paper considers the role of archival description as a tool for institutional and social accountability. The analysis is conducted through a comparison of accountability in traditional post-hoc archival description with description in the continuum-based model of recordkeeping. The author suggests that while both approaches have validity as tools of documentary accountability within their spheres, neither alone can ensure the wider accountability of an institution to itself or to society at large. A broader organizational and social accountability is necessary to ensure the integrity not just of current and historical records, but also of the larger spectrum of actions of the agency responsible for creating and keeping those records.

To state the facts frankly is not to despair the future nor indict the past. The prudent heir takes careful inventory of his legacies and gives a faithful accounting to those whom he owes an obligation of trust.

—John F. Kennedy, 1961

Accountability has been defined by agencies such as the International Standards Organization as “the principle that individuals, organizations and the community are responsible for their actions and may be required to explain them to others.”¹ Put more simply, accountability is “the obligation of the

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¹ International Standards Organization, *ISO 15489*, Part 1, Clause 3.2. The definition is also articulated in the Australian Standard *AS 4390-1996*, Part 1, Clause 4.1, repeated in the glossary of the *Government Recordkeeping Manual* of the State Records New South Wales, Australia, accessible on-line at <http://www.records.nsw.gov.au/>, accessed 29 March 2004.

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delegate to account for its actions.”² Trust is the belief in the responsibility of others; accountability is the tool that ensures that trust is not misplaced. A cynic might suggest that “accountability” is a fashionable buzzword, the current “flavor of the month.” Boardrooms and bars are filled with talk of accountability and transparency, accountability and good governance, and accountability and anticorruption. In Canada and around the world, names such as Enron, WorldCom, Parmalat, Hollinger, Groupaction, and CBS conjure up images of deceit and mismanagement; of the falsification or misrepresentation of information—of an absence of accountability.³ Accountability and trust go hand in hand; each is critical to the effective and ethical operation of any society, be it a city government, a business, a charity, a church, or a volunteer group.

But accountability does not just arise, unconsciously or inevitably, as though under the direction of an unseen hand wielding the spirit of ethics and principles. Accountability is and must be inextricably bound with responsibility and authority. It must be instilled in a person, or an organization, through a clear identification of rights and obligations. Accountable people must be answerable for the discharge, or dereliction, of their stated duties, and they cannot be held accountable if they do not have the responsibility or the authority to act. Citizens will only offer their trust if they feel it will be respected and safeguarded. An effective society expects those who can exercise their authority to be accountable for their actions; an honorable society then protects those without authority, such as children or the mentally ill, against the danger of abuse.

In an organizational setting, a person’s corporate accountability (rather than his or her personal accountability) arises directly from the level of authority and type of responsibility he or she has been given within the administrative structure. Boards of directors, chief executive officers, departmental managers, desk clerks, janitors—all operate within the limits embedded in their job descriptions. While one hopes that a personal sense of responsibility will supply an individual with an ethical focus, it is the corporate structure and culture, be it hierarchical or flat, autocratic or consensus-based, that provides the organizational framework for accountability. Sadly, “It’s not my job, man” can be a valid excuse for gaps in accountability. It is up to the designer of the “job,” or to the larger society, to ensure that accountability matches responsibility up and down the chain of command, with no missing links.

Unfortunately, the link between accountability and recordkeeping is not so clear in the minds of many, whether public citizens or public servants. But the

² Heather MacNeil, “Picking Our Text: Archival Description and the Apparatus of Authenticity,” presentation to the Association of Canadian Archivists’ conference, Montreal, May 2004.

³ There is even a Web site devoted to “financial scandals,” which gives a description of and provides links to resources about a range of fraudulent activities. Go to <http://www.ex.ac.uk/~RDavies/arian/scandals/>, accessed 30 March 2004.

link is inextricable, as the recent stream of corporate and government scandals highlights all too vigorously. More and more, records managers and archivists hold up records- and information-related crises as examples of the importance of quality recordkeeping and the central role of qualified professionals in the creation, care, and preservation of “good” records—of accountable records. To press the point, articles are written and speeches given highlighting the link between records and accountability. Functions such as appraisal, classification, scheduling, preservation, and access are being scrutinized for their role as tools of public accountability, corporate responsibility, and good governance.

One area of records and archives work has, however, been left out of the debate on accountability. What is the relationship between organizational and social accountability and the task of description? Do descriptions of records and archives exist simply to illuminate the content, context, and structure of a body of materials, thereby limiting their role as tools of accountability? Or can these descriptions be used to hold an agency responsible for its actions by providing important information about the documentary products of its business?

The challenge with this analysis is that there is no longer one vision of “archival” description. Ten, fifteen, or twenty years ago, archival description usually involved the contextualization of records after the fact, post hoc, in archival institutions, after records had passed the last stage of their “life cycle” and were no longer considered of administrative value. Today, description encompasses both records and archives. To some, the task is best managed through a continuum approach; to others it is better separated into discrete tasks: first records management, then archives management. Any discussion of the role of description as a tool for institutional or social accountability must address both of these approaches head on.

This paper, therefore, offers a comparison of the two methodologies, not to pit one against the other but, instead, to consider the extent of, and limits on, organizational accountability within each. In the end, a comparative analysis suggests that both the post-hoc and continuum approaches have validity as tools of accountability each within its own sphere, that is, within the defined limits of responsibility and authority. Neither approach by itself, however, can ensure the wider accountability of an institution to itself or to society. A broader organizational and social accountability, managed through a regulatory environment that requires honest and complete documentation of actions and decisions, is necessary to ensure the integrity not only of current and historical records but also of the agency itself.⁴

⁴ Throughout this paper, consideration is given to the Australian continuum model of recordkeeping, in comparison with North American descriptive practices. As such, the author must acknowledge the Australian preference for the term “recordkeeping,” not “record-keeping” or “record keeping,” which is also in keeping with the *American Archivist* editorial style. Consequently, unless providing a direct quotation that presents the term otherwise, the author uses the term “recordkeeping” throughout.

The North American Tradition of Archival Description

Traditional archival description, an approach most often discussed in a North American context, occurs after the acquisition, appraisal, and arrangement of a body of noncurrent records, which have been removed intellectually or physically from the creating agency and placed in a separate administrative environment: an archival facility. It is possible, but not assured, that before the records moved to the archives, the creating agency created classification schemes, retention schedules, and other documents that provided information about those records for the use of officers in the agency. Once in archival custody, the records are defined in large part by their historical, evidential, or informational value. The descriptions created explain the nature and scope of the extant holdings, particularly for the benefit of users outside of the creating agency, who need to understand that organizational context of the materials to make best use of them.⁵

This access-oriented vision of description is confirmed by the international descriptive standard *ISAD(G)*, which argues that “the purpose of archival description is to identify and explain the context and content of archival material in order to promote its accessibility.”⁶ This perspective is also firmly articulated in the Canadian descriptive standard, *Rules for Archival Description (RAD)*, which defines archival description as “the definitive representation of the archival material . . . required to establish intellectual control over it and promote access to the information which it contains.” According to the Canadian and international archival communities, archival description involves

the creation of an accurate representation of the fonds and its component parts by the process of capturing, collating, analyzing, and organizing any

⁵ MacNeil, “Picking Our Text.” One could write a book on archival description in the North American context. Indeed, many have, and this author is not about to repeat the exercise. Readers wishing to read more about the nature and intention of this approach to archival description are encouraged to review the core literature on the subject, including Bureau of Canadian Archivists, Planning Committee on Descriptive Standards, *Rules for Archival Description* (Ottawa: Bureau of Canadian Archivists, 1990–) and *Rules for Archival Description, 2d edition* (Ottawa: Bureau of Canadian Archivists, 2003). Both are available at <http://www.cdncouncilarchives.ca/archdesrules.html> and <http://www.cdncouncilarchives.ca/rad2.html>. See also Luciana Duranti, “The Origin and Development of the Concept of Description,” *Archivaria* 35 (Spring 1993): 47–54; International Council on Archives, *ISAD(G): General International Standard Archival Description* (Ottawa: International Council on Archives, 2000), available at http://www.ica.org/biblio/isad_g_2e.pdf; and Heather MacNeil, “The Context Is All: Describing a Fonds and its Parts in Accordance with the Rules for Archival Description,” in *The Archival Fonds: From Theory to Practice*, ed. Terry Eastwood (Ottawa: Bureau of Canadian Archivists, 1992), 195–225.

⁶ *ISAD (G)*, 7. The standard also notes that “description-related processes may begin at or before records creation and continue throughout the life of the records. These processes make it possible to institute the intellectual controls for reliable, authentic, meaningful and accessible descriptive records to be carried forward through time.” *ISAD(G)* clearly states, however, that its primary focus is on intellectual control of records held under archival control, whether that control is physical or administrative.

information that serves to identify archival material and explain the context and records systems which produced it.⁷

This vision of archival description is post hoc and retrospective. According to Canada's descriptive standard, for archival description to proceed, the records in question need to have been deemed archival, and they need to be, somehow, "stable," whether in the physical custody of the archives or not. The archivist's accountability is rendered through the production of a completed finding aid, ideally created according to the standards set by tools such as *RAD*. In this context, accountability is achieved when a descriptive tool such as a finding aid, an index, or a database entry is created that "identifies and explains."

Interestingly, the second edition of *RAD* was developed in a time of intense discussion about the nature of recordkeeping, the relative benefits of the continuum versus the life-cycle models, and the importance of metadata management. Institutions such as the University of Pittsburgh and the University of British Columbia invested significant energy investigating issues surrounding the authenticity and preservation of electronic records. At the same time, the international archival community began to call more vociferously for recordkeeping standards and guidelines for e-records management. Tools such as the MoReq and ISO standards for recordkeeping were created to address the increasingly complex challenge of creating and preserving authentic and reliable records, not just the need to document the residual materials left behind.⁸

In 2003–2004, *RAD* was reviewed and revised, and a new *RAD2* issued for public comment. The authors of *RAD2* recognized that "descriptive information is required at all stages of the management of archival materials" but then confirmed that a more specific interpretation of description was necessary for archivists. In spite of this extensive work underway to control all stages of the creation, use, and preservation of records, however, the internationally accepted vision of archival description enunciated in tools such as *RAD* still remains a post-hoc, retrospective approach, intended to control records that are

⁷ *RAD2*, 1. As is discussed below, *RAD2* includes some revisions that imply that the authors recognize that not all archives are managed in a custodial, post-hoc environment, but it is suggested by this author that these revisions do not fully address changing records practices. See footnote 28 below.

⁸ For more information on the work undertaken at the University of Pittsburgh, see the documents relating to "Functional Requirements for Evidence in Electronic Recordkeeping." The Web site has been preserved on the Web site of *Archives and Museum Informatics* at <http://www.archimuse.com/papers/nhprc/>. For more on the University of British Columbia studies, including the current InterPARES work and previous research, go to <http://www.interpares.org/>. More recently, the European Community (through the consulting firm Cornwell Management Consultants) developed MoReq: a model specification of requirements for electronic records management systems. Information about this tool can be found at <http://www.cornwell.co.uk/mainmenu.htm>. And the International Standards Organization has developed *ISO 15489*, a standard designed to help organizations "develop policies, strategies and programmes which will ensure that information assets have the essential characteristics of accuracy, integrity and reliability." See the ISO Web site at <http://www.iso.org/iso/en/ISOOnline.frontpage>.

intellectually, if not physically, in the care and custody of a designated archival repository.⁹

Description and the Continuum

The continuum model offers a different vision of archival description, one that addresses the changing nature of records over time and space and aims to reduce or eliminate the “archival boundary” between present and past. This vision originated in the articulation by Australian Peter Scott in the 1960s of what is now called the “series system.”

According to Scott, description ought to document two categories of information separately: first, information about the records and, second, information about the administrative context within which those records were created. This separation of content and context in description was necessary, argued Scott, to take into account the complex nature of provenance and the fact that records can have multiple provenancial relationships. In essence, the Australian series system consists of two interrelated parts: control of context, which involves identifying the “entities” that create records, and control of records, which involves identifying the records series and items within the series.¹⁰

As Terry Cook has noted, Peter Scott’s vision serves as the foundation of a “post-custodial revolution” in archival thinking, one which also changed the nature of description.¹¹ By separating the content and the context in descriptions, it would be possible to create descriptions of records that recognized changes in creation, management, and custody. This flexibility in description was most valuable, and most often applied, in the management of organizational records, including electronic records, rather than in the description of personal

⁹ See *RAD2*, 4–8. Indeed, the planned “CUSTARD” project to create a North American descriptive standard did not come to fruition, for reasons not yet clearly articulated to the archival communities in the United States and Canada. One can only speculate that the concepts of life cycle versus continuum management, and the notion of managing fonds versus discrete items or collections, played a part in the discussion. The author examined some of these issues in her article on the concept of the fonds; see Laura Millar, “The Death of the Fonds and the Resurrection of Provenance: Archival Context in Space and Time,” *Archivaria* 53 (Spring 2002): 1–15.

¹⁰ Adrian Cunningham provides a valuable description of the series system in two articles. See “Dynamic Descriptions: Australian Strategies for the Intellectual Control of Records and Recordkeeping Systems,” presentation to the Royal Society of Archivists of the Netherlands symposium, 23 October 1998 (accessible through the National Archives of Australia Web site at <http://www.naa.gov.au/recordkeeping/control/strategies/default.htm>, accessed 2 February 2004) and “Recent Developments in Standards for Archival Description and Metadata,” presentation to the International Seminar on Archival Descriptive Standards, University of Toronto, March 2001. (See the Australian Society of Archivists Web site at <http://www.archivists.org.au/cds/cunningham.html>, accessed 16 March 2004).

¹¹ Terry Cook, quoted in Cunningham, “Dynamic Descriptions,” 4.

or private records.¹² Scott's vision also accommodated the emerging reality of electronic records, where it was sometimes not even possible to capture or "acquire" a physical object. The series system laid the groundwork for a fresh look at the entire concept of recordkeeping, leading to the vision of a "continuum model," in which records are managed not from cradle to grave but, as Sue McKemmish has argued, as a "complex multi-layered recordkeeping function that is carried out through a series of parallel and iterative processes that capture and manage 'recordkeeping metadata.'" ¹³

As Adrian Cunningham explains, the underlying vision of description is to capture essential information at the earliest recordkeeping stages possible and carry that information through the "life" of the record. Cunningham strongly rejects post-hoc description, as does his colleague Chris Hurley, who is particularly critical of the approach taken by organizations such as the International Council on Archives (ICA), suggesting that there are "conceptual flaws" in the vision that a core archival responsibility is to produce an "interface" between users and archival holdings.¹⁴

Suggesting that traditional archival description has been "enmeshed in collection description—circumscribed by location of records and by their appraised value," Hurley argues instead that description is an integral part of

¹² Indeed, a particular gap in the continuum model is its inevitable exclusion of personal or private records. In the context of this paper, then, the entire question of accountability—and the regulatory framework required to ensure that records are created and kept as evidence of actions and transactions—applies most directly to the public sector and to those agencies drawing on public resources. Cook addresses the issue of private records in the continuum at some length in "Beyond the Screen: The Records Continuum and Archival Cultural Heritage," paper delivered to the Australian Society of Archivists' Conference, Melbourne, 18 August 2000 (accessible on the Australian Society of Archivists' Web site at <http://www.archivists.org.au/sem/conf2000/terrycook.pdf>, accessed 30 March 2004).

¹³ Sue McKemmish, quoted in Cunningham, "Dynamic Descriptions," 4. See also Sue McKemmish, "Are Records Ever Actual?" (1998), accessible through the Monash University Records Continuum Research Group Web site at <http://www.sims.monash.edu.au/research/rcrg/publications/smcktrc.html>, accessed 23 March 2004), 7, 9. It is important to note that the series system is not equivalent to the continuum. The series system still operates from an archival perspective, while the continuum approaches recordkeeping as an integrated whole. Archives that do not follow the continuum model can still apply the series system to descriptions, capturing separately information about records and creators and then making the links to illuminate complex or multiple provenancial relationships. Further, the series system of description can be one element in a toolbox containing different descriptive methods, depending on the nature of the agency using the tools. But it is reasonable to assert that the series system, which can be applied post hoc, and the continuum method, which by its very nature is not post hoc, are largely government-oriented approaches, designed to suit an environment guided by regulations and requirements. As Cunningham notes, the series system has been adopted by most state governments in Australia, but many archival programs in the country have retained the "record group" approach to intellectual control and description, including many library-based historical manuscript and collecting programs. See Cunningham, "Dynamic Descriptions," 2 and "Recent Developments in Standards," 11. The series system is discussed at more length and specific descriptive methods are explained in the Australian Society of Archivists, Committee on Descriptive Standards, *Describing Archives in Context: A Guide to Australian Practice*, Consultation Draft, August 2003 (accessible through the Australian Society of Archivists Web site at <http://www.archivists.org.au/cds/> accessed 16 March 2004).

¹⁴ Cunningham, "Dynamic Descriptions," 1, 6.

the recordkeeping process, urging archivists to move beyond the “archival boundary” and to derive evidence from records “not by reference to our observation of it in the circumstances obtaining when we access it, but by understanding the circumstances which existed at its creation and the changes since.”¹⁵ Barbara Reed shares Hurley’s point of view, arguing that “records are not passive objects to be described retrospectively. Rather, they are agents of action, active participants in business activity that can only be described through a series of parallel and iterative processes.”¹⁶

Description as a Tool for Accountability

It is neither appropriate nor sensible to condemn one or the other of these approaches. Each is a creature of its own time and place, emerging out of unique social, political, and cultural realities.¹⁷ While the urgency of effective and efficient institutional records care naturally demands that more attention be placed on the management of current records, the traditional approach remains particularly entrenched in the North American environment, where, for example, the preservation of personal and private papers for historical purposes—an endeavor tightly bound by politics, economics,

¹⁵ Chris Hurley, “The Making and Keeping of Records: (1) What Are Finding Aids For?” *Archives and Manuscripts* 26 (May 1998) especially 59, 61, 74.

¹⁶ Barbara Reed, quoted in Cunningham, “Recent Developments in Standards,” 10. The most recent extension of the continuum approach to description has been research into the role and nature of recordkeeping metadata. As Cunningham and others have proposed, metadata is “structured or semi-structured information which enables the creation, management and use of records through time and across domains. Recordkeeping metadata can identify, authenticate and contextualize records and the people, processes and systems that create, manage and use them.” Cunningham, “Recent Developments in Standards,” 7. At present, extensive research into metadata is underway at Monash University, as part of a project titled “Create Once, Use Many Times—The Clever Use of Metadata in eGovernment and eBusiness Processes in Networked Environments.” In this project, the researchers propose three entities about which recordkeeping metadata should be captured: people, business, and records. According to the project developers, people conduct business and people create, manage, and use records. The aim of the project is to help develop a standard for the metadata that government agencies should capture about these three entities in their agency recordkeeping systems. Cunningham provides a good overview of the precursors to the project in “Recent Developments in Standards,” especially pages 9–10. See also the project Web site at <http://www.sims.monash.edu.au/research/rcrg/research/crm/index.html>.

¹⁷ In 1994, David Wallace, Heather MacNeil, and Wendy Duff participated in a debate on the topic at the Association of Canadian Archivists Conference. Their papers are available in *Archivaria* 39 (Spring 1995). Specifically, see Wallace, “Managing the Present: Metadata as Archival Description,” 11–21; MacNeil, “Metadata Strategies and Archival Description: Comparing Apples to Oranges,” 22–32; and Duff, “Will Metadata Replace Archival Description: A Commentary,” 33–38. As Heather MacNeil has pointed out, this discussion took place long before the present metadata models had been established, but even then the issue of metadata management versus traditional description was an important point of discussion. The author is grateful to Heather MacNeil for her comments on this topic.

and culture—continues to demand an after-the-fact approach to archival management.¹⁸

This paper is not an exercise in ranking one approach over another. The questions here are different. What are the consequences for accountability of pursuing a post-hoc approach or a continuum approach to description? What kind of accountability is achieved by each method of description? Does either approach by itself achieve the ultimate goal of full institutional and social accountability for the documentation of decisions and actions?

As defined earlier, accountability is the obligation of the delegate to account for its actions, to be prepared to render an account. The measure of accountability, therefore, depends on what the delegate has been asked to do; in this case, the measure of accountability depends on the purpose behind the descriptive process. In the traditional post-hoc approach, the purpose of description is “to identify and explain the context and content of archival material in order to promote its accessibility.”¹⁹ The archivist has a responsibility in traditional archival description to account for what is “in hand,” including information about how it came to be in the archival institution and what actions occurred that helped shape the form and nature of the materials in their journey through a “life cycle”: from current to semicurrent to archives. In this instance, accountability is confirmed by the existence of a completed and accessible descriptive tool.

The application of descriptive standards such as *RAD* or *MAD* or *ISAD(G)* is a means of encouraging conformity in the descriptive process. Formalized descriptive structures establish a basis for comparison, making it possible to measure independently the quality, content, and value of the resulting product: the description. In effect, the descriptive standard establishes the benchmark for accountability in the descriptive procedure by normalizing the process and establishing criteria against which to measure success.

¹⁸ The continued presence and strength of American historical society archives, university special collections, and combined museum/archives or library/archives agencies is a testament to the ongoing belief in the importance of preserving historical materials outside of a centralized, publicly administered institutional context. This approach is different from the Canadian total archives approach, which often still separates current from historical records but emphasizes public responsibility—through tax dollars and grant funds—to pay for the cost of establishing and maintaining archival facilities that hold both institutional and noninstitutional archives. As the author has argued many times before, the cultural differences among different jurisdictions are critical defining factors in the nature of the archival, heritage, and information agencies established. The American context is discussed, albeit briefly, in Laura Millar, “Discharging Our Debt: The Evolution of the Total Archives Concept in Canada,” *Archivaria* 46 (Fall 1998): 103–46 and “The Spirit of Total Archives: Seeking a Sustainable Archival System,” *Archivaria* 47 (Spring 1999): 46–65. For a more detailed discussion of the American context, see Luke J. Gilliland-Swetland, “The Provenance of a Profession: The Permanence of the Public Archives and Historical Manuscripts Traditions in American Archival History,” in *American Archival Studies: Readings in Theory and Practice*, ed. Randall C. Jimerson (Chicago: Society of American Archivists, 2000), 123–41.

¹⁹ *ISAD(G)*, 7.

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In the continuum approach, the purpose of description is to “ensure that records are preserved in the context of their creation and use, and retain their qualities as evidence so that when retrieved for future use their meaning and significance can be understood.”²⁰ In this instance, accountability is confirmed by the continued existence of those records, with their evidential qualities and contextual information intact. Accountability is achieved when the records remain useful as evidence, through the existence of “authoritative metadata” that provide “intellectual control.”²¹

The application of a metadata schema or metadata standards is critical to the success of description in the continuum model. The schema serves as the mechanism by which standards can be applied to the capture of data. The standard set by the identification and consistent use of metadata establishes a benchmark for accountability in this descriptive process, by normalizing the process and establishing criteria against which to measure success.²²

Each approach, post hoc and continuum, provides its own measure of accountability. To understand precisely the type of accountability achieved, and its limitations, it is necessary to dig more deeply into each approach. Consideration of each method through the analysis of a fictitious case study will highlight the role of each approach and demonstrate the reality that each method, in fact, serves as a different tool, providing its own type and level of accountability. That accountability is directly related to the level of authority and responsibility assigned to the practitioner—archivist or recordkeeper—within an institutional framework. The real issue is not whether one approach or the other results in a “better” descriptive product, but rather that neither approach has the power to overcome the reality of the workplace. Neither post-hoc description nor continuum management will by itself ensure that an organization acts in an accountable and responsible fashion. And therein lie the limitations on description as a tool for accountability.

²⁰ McKemmish, “Are Records Ever Actual?” 7, 9.

²¹ McKemmish, Acland, Ward, and Reed, “Describing Records in Context in the Continuum,” 4.

²² It is important to acknowledge, as Terry Cook has suggested, that description in the continuum may include a larger contextualization of records than simply the insertion of item- or object-oriented metadata tags. However, it can also be argued that, just as traditional description relies on analysis of the records themselves, continuum-based description at any point depends on the creation, and then analysis, of metadata. Therefore, the examination of accountability and descriptive practices presented here compares two primary methods of identifying and thereby authenticating records. It is also important to acknowledge that, within the continuum approach, descriptive activities can take place at different dimensions, from creation and capture to organization and pluralization. As Cook has suggested, the pluralization of archives, identified as the fourth dimension of the records continuum, is the place in which the broadest contextualization of records can take place. He also suggests that the continuum has been misunderstood and that discussion of this fourth dimension—where records are accessed and used by an audience wider than those directly involved in the organization or its transactions—is “almost absent” from archival literature. See Cook, “Beyond the Screen,” especially 11–12. Perhaps increased attention to this dimension will change the dynamics of description in the continuum model.

The Case of the Incomplete Archives

An archivist in a government repository has, among other jobs, responsibility for acquiring, preserving, and making available for public use the archives of a particular public agency. This agency is responsible for providing funds to communities across the country to support cultural and community events.²³ One day, the archivist receives an accession of several boxes of records, all over seven years old, spanning ten years of activity. The archives has been transferred as part of a regular records management process, and a quantity of records has already been destroyed according to approved disposal schedules.

Along with the materials themselves, the archivist obtains information from the agency about the mandate and scope of the program and is able to speak with one of the portfolio managers involved at the time the records were created. The archivist arranges the records according to established rules, including *respect des fonds* and original order, and prepares a description of the materials following standards established by *RAD*. She outlines the scope and content of the records and explains their custodial history, includes information about the acquisition and original arrangement of the records, and outlines the origins and history of the agency and the program. The completed descriptive information is added to the institution's Web site, made available in print and electronic form in the reference room, and uploaded into various national and regional archival databases. The archivist's descriptive responsibility is to create

²³ The author must remind readers, especially in Canada, that this is presented as a hypothetical situation. However, to read about a "somewhat" similar situation, interested parties may wish to look at Canada, Auditor General, *Report of the Auditor General to the House of Commons: Matters of Special Importance, 2003* (Ottawa, Ontario: Office of the Auditor General, 25 November 2003), accessible on-line at http://www.oag-bvg.gc.ca/domino/reports.nsf/html/03menu_e.html#03nov06, accessed 29 March 2004. Another interesting case of questionable public-sector practices in Canada, a predecessor to the "hypothetical" scenario presented here, is described in David A. Good, *The Politics of Public Management: The HRDC Audit of Grants and Contributions*, IPAC Series in Public Management and Governance (Toronto, Ontario: University of Toronto Press, 2003.) In January 2006, Canada's Liberal minority federal government was defeated by the opposition Conservative Party in an election fought largely on the issue of accountability in government. The underlying "Adscam" scandal was one of a number of cases in Canada of alleged government corruption, most of which have been underpinned by the suggestion of the poor management of records. The commissioner appointed to investigate this particular scandal, the Honorable John Howard Gomery, did indeed find that records—or the absence of them—was a major contributing factor in the ability of some in government to mismanage public funds and public programs, whether accidentally or deliberately. Justice Gomery's second report, released in January 2006, identified recordkeeping as a critical component of accountable and transparent government services. As Justice Gomery noted in chapter 10 of the report, "The Commission concurs with the Information Commissioner that there should be mandatory record-keeping in government, and that the obligation to create a 'paper trail' should be something more than a matter of policy. It should be an explicit part of the law of Canada. Accordingly, the Commission agrees that the *Access to Information Act* 2 should be amended to include an obligation on the part of every officer and employee of a government institution to create records that document decisions and recommendations, and that it should be an offence to fail to create those records." See the official report, "Restoring Accountability: Recommendations," at <http://www.gomery.ca/en/phase2report/recommendations/index.asp> accessed 27 February 2006.

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a standardized description of the archives in hand. The completed description is her “account” of that responsibility. She can be held accountable.

Some time later, a researcher reviewing the files discovers that many relevant records that “ought” to be in the files are not in fact there. It is not known if records were destroyed at some point before they came to the archives. Equally, it is not known if records were simply not created in the first place. Policies and decisions might have been articulated through verbal communications, in weekly or occasional meetings perhaps, but never put in writing. Either way, there is a gap in the evidence base: the agency’s actions are not fully supported by records documenting those actions. Something is missing in the records process, resulting in diminished organizational accountability.

The archivist sits “at the end of the line.” She cannot be held responsible for the fact that records that ought to have been on file are not. She may only discover the absence of information if she consults the agency classification system and retention schedule or interviews the portfolio manager involved at the time, and she can only describe the records she has. This task of description in this traditional, post-hoc environment does not require the archivist to identify what *should* have been in the boxes, only what *is* in the boxes.

As has been argued by the proponents of the continuum approach, there is a weakness in the link between the “active” management of the record and its “archival” management in this situation. As a result, records that once were part of the larger “whole” may be missing, and the agency responsible for the work documented (or not documented) by the records could be considered remiss in its duty to account for its actions and decisions. Accountability may be the obligation of a delegate to render an account, but the agency cannot easily render an account if it does not have the records.

That absence of accountability is not the archivist’s, however. In her descriptive role, she has neither the responsibility nor the authority to tell the government to create and keep necessary records and not to destroy materials without appropriate controls and approvals. That advisory task would fall to the records manager, if there is one, who in this scenario functions in a different sphere. Since this archivist is removed from the realm of records management, she will always operate “after the fact”—post hoc.

The Case of the Incomplete Archives Revisited

Consider this same scenario in the continuum model. Rather than waiting for the records to age and eventually make their way to the archivist’s waiting hands, the “recordkeeper” would have participated in the management of those records from the time of their creation. The recordkeeper would work with the agency to establish records standards and install a framework for the inclusion of recordkeeping metadata as records are created. That metadata would

identify the record, authenticate it as a record created by that agency for a particular business purpose, and track the management and use of the records over time.²⁴

In this case, the recordkeeper does not have to wait for a researcher to discover gaps in the records, nor does he have to review historical information or interview agency representatives to understand the nature of the records created. By creating the metadata that accounts for the existence, context, and content of records in the system, the recordkeeper has ensured that those records remain understandable and authentic. Those actions that have been recorded have been captured, with the aid of metadata. It is presumed they will then be retained if they have long-term value or disposed of if they do not. The metadata can then be used to create descriptions or identify records. The recordkeeper has fulfilled his requirements for accountability in this process.

What if someone discovers that records are missing? No problem: the metadata should include information about what was destroyed. An intellectual “trail” can be maintained between what existed in the first place and what continues to exist at different points. As proponents of this model argue, the metadata allows the record to be a “self-managing information object” and an “intelligent agent.”²⁵

But what if relevant records were never created? What if decisions were made and communicated verbally, during closed-door meetings or over long lunches? The metadata cannot control whether or not that “intelligent agent” is produced in the first place. In this scenario, the relationship between the activities of the agency and the recordkeeping process is more entwined, but there is still a fundamental gap. There remains an absence of “complete” accountability within the agency in question. One could argue that the agency responsible for the work is still remiss in its duty to account for its own actions and decisions. As was the case earlier, the agency cannot render an account if it does not have the evidence.

But, as before, the absence of accountability is not the recordkeeper’s. He has neither the responsibility nor the authority to tell the government to create necessary records. He can only help the agency keep those records it chooses to create, by establishing and following the guidelines set for metadata management. It is not up to the recordkeeper to establish the larger organizational framework of accountability. His job is to manage the records created within the framework in place. The conceptual framework for metadata management

²⁴ See Duff and McKemmish, “Metadata and ISO 9000 Compliance,” especially 2–5. It is worth remembering that implicit in the continuum process is the vision, likely but not inevitable, that these records will never even leave the agency; that in paper or electronic form they will remain with the creating office and be managed and accessed in a noncustodial fashion.

²⁵ McKemmish, Acland, Ward, and Reed, “Describing Records in Context in the Continuum,” 21.

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recognizes the importance of mandates, which “establish who is responsible for what and govern social and organizational activity, including the creation of full and accurate records.”²⁶ But the inclusion of metadata about records and mandates does not by itself guarantee that a particular mandate has been identified, articulated, or fulfilled. As was the case with the archivist, the recordkeeper’s accountability is limited to his particular responsibility within the larger organizational universe.

Linking Description with Accountability

Ultimately, accountability in recordkeeping, as in any endeavor, can only apply in direct relationship to responsibility. We cannot be accountable if we do not have the responsibility or authority to act. When describing records following a continuum or a post-hoc approach, the recordkeeper and the archivist can be accountable for their actions, but only to the limit of their authority. Is one approach better than another? The continuum model certainly offers a more holistic approach to records care. It allows for a greater degree of control over the recordkeeping process than does the traditional archival approach. But it can be argued that the post-hoc approach can serve an important documentary function, capturing the reality of the care of records over a past time, as a historical, perhaps almost archaeological, enterprise.

Accountability and the Continuum

In the continuum model, the recordkeeper is a member of a larger organization, the one that created the records. His task is to help that organization operate more effectively, more efficiently, and, one hopes, with more accountability. As a member of the agency responsible for undertaking the actions documented by the records he manages, he is intimately involved with the creation and capture of those records. Administratively, he is answerable within the agency, not outside of it. His descriptions are internally managed representations of records, created to help the agency perform its work. In this environment, the description of records created as part of the recordkeeping process is dynamic, not static. It is fashioned and refashioned to manage records as evidence throughout the “continuum.”

In the continuum context, any attempt to impose a wider accountability on the creators of the records is limited by two factors. First, the recordkeeper’s responsibility is to ensure that those records that *are* created are well managed. His task is *not* to ensure that actions or decisions result in records. Second and

²⁶ Duff and McKemmish, “Metadata and ISO 9000 Compliance,” 4.

more serious is the fact that the recordkeeper himself is accountable to the agency responsible for creating, or not creating, those records. If his boss says "It's not your job, man," the recordkeeper would be hard pressed to question that authority. His responsibility and his accountability are limited not only by the scope of his job description but also by the reality of his organizational environment.²⁷

Accountability and Post-hoc Description

In the traditional, post-hoc model, the archivist is also a member of a larger organization, but that organization may not be the same one that created the records. Her task is to explain a body of records—what is in it, how it came to be, and how it came to be in the care and custody of her institution. In this case, the role of traditional archival description is not to control recordkeeping, a fact some argue is a deficit but which is, perhaps, simply a different means of achieving accountability. Perhaps, ultimately, the primary purpose of "traditional" archival description is not to share information about a body of records but rather to explain the inherent characteristics of those records that serve as the remaining evidence of the work of the creating agency.

In this scenario, the archivist would be accountable to explain the past: the past records, and the past events that led to the records. Ideally, the archivist provides this explanation not just by creating a simple catalogue of the scope and contents of existing boxes and files but by preparing a comprehensive and analytical examination of the functions and activities of the creating agency and of the subsequent parties involved with the records, including records managers, archivists, and ultimately, perhaps, users. Rather like an archaeological dig, the analysis would excavate the remains and explain not only what is *there* but what is *where*, with speculations as to why.

At present, however, post-hoc descriptions often fail to provide this detached, investigative analysis. Descriptive standards such as *RAD* do not encourage the wider contextualization of records, the consideration of organizational and personal motivations, and the consequences for what was kept or removed and why. To achieve this more complex and necessarily "after the fact" description, tools such as *RAD* would have to be refashioned to help the archivist look beyond the static box of records in hand to consider in more depth the

²⁷ While standards such as *ISO 15489* and the *Australian Records Management Standard, AS 4390* may encourage "the means to ensure the creation of adequate records," unless those standards are translated into policies for records creation at the highest level of organizational management—above and beyond the recordkeeper's realm—the recordkeeper as presently constructed has no more power than the archivist to control what the agency will or will not record. McKemmish, Acland, Ward, and Reed, "Describing Records in Context in the Continuum," 3.

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history of their creation, use, custody, management, and construction within and outside in the archival sphere.²⁸

Some argue that the continuum approach allows for this broader analysis, by documenting, as Hurley argues, “the circumstances which existed at [the] creation [of records] and the changes since.”²⁹ The challenge is to allow the “changes since” to be documented in a manner free from organizational intervention and control. At some point, someone has to be removed from the creating agency, in order to have the liberty to analyze, assess, and document the story behind the creation and use of records in question. The recordkeeper in the continuum environment might have the theoretical wherewithal, but he probably does not have the organizational independence. The archivist in the post-hoc world may have the institutional liberty, but she does not have the sophisticated descriptive tools. One sits inside the tent and hasn’t the freedom to look out. The other sits outside the tent but hasn’t the spyglass to look in.

Achieving a Wider Accountability

In either case, the records professional is not charged with the task of ensuring that an accountable record is created in the first place. The archivist may serve post hoc, but equally the recordkeeper does not serve *ab initio*—from the beginning. Despite the work of recordkeepers and archivists to document the records in their control, information may still be lost or destroyed or not created in the first place. Verbal instructions may not be documented; inappropriate actions may take place and no evidence captured; resources may be misused or wasted. Further, nothing in records or archives practice can control the reality that, even if records are created, they may be “bad” records. They may contain, by accident or design, incorrect information, mistruths or untruths, inadequate evidence, or unclear statements.

To suggest that recordkeepers and archivists must be responsible for keeping governments and organizations in line, that records professionals are, by virtue of their occupation, responsible for ensuring that their organizations create and keep accurate and reliable records of all official actions, is to give the profession a level of responsibility that only the most egotistical narcissist would

²⁸ See Millar, “The Death of the Fonds and the Resurrection of Provenance.” The most recent revisions to *RAD* shown in *RAD2* expand on elements such as appraisal/scheduling/destruction (7.3), relationships between entities and archival materials or materials not housed in an archival repository (15.2 and 15.3), and the system of arrangement (5.2). However, these additions still do not allow *RAD2* to reach beyond its existing purpose as a means of sharing information. The possibilities still exist to create a much more sophisticated descriptive tool, one that examines not only the nature of the records and the work of the creating agency but also the scope and vision of the archival institution and the political, cultural, social, and economic environment in which the records were created, used, kept, and then reused and refashioned—as archives. See *RAD2*, especially appendix A.

²⁹ Hurley, “What Are Finding Aids For?,” see especially 59, 61, 74.

consider reasonable. Unfortunately for the profession, however, our work involves an essential component of daily life: the documentary products of humanity's actions, transactions, deliberations, ideas, and dreams. Just as doctors, who as a profession are known for carrying around more than a modicum of ego, see their role as "saving lives", records professionals sometimes perceive their role as "saving memories" or "saving evidence." Our slogan could be "protecting the truth through proof." But all we can save is the proof we have the authority to save, and we certainly can't ensure it is the truth. Nor do we have the power ourselves to compel anyone else to tell the truth or keep the proof.

The question, then, is not which of two approaches to the description of records is the better tool for organizational accountability. Each method offers its own level and type of accountability, and in practice each of the two approaches can draw on elements of the other, creating a fusion of methods. The underlying questions are: How can a society, a government, or an agency establish mechanisms to ensure it achieves organizational and social accountability? How can society ensure that those actions that *should* be documented *are* documented? How can anyone ensure a wider accountability?

Ultimately, accountability exists both before and after the fact. Any action taken or decision made, especially in the public sphere, must be documented as evidence. And that evidence must be managed and protected. Then it must come to a safe place where it is held as evidence of that action. Early in the process, someone—the recordkeeper—has a role in helping the government ensure that when records are created and used they retain their authenticity and evidential value. Later in the process, someone else—the archivist—has a role in ensuring that valuable records are captured, protected, interpreted, and made available as evidence—even as evidence of "bad" recordkeeping, mismanagement, or abuse.

There is and ought to be a distinction between the making and keeping of records and the making and keeping of archives. The application of the principles of the continuum ensures the effective and, one hopes, accountable progression of records through the organizational process. The recordkeeper helps to capture as authentic a record as possible of the responsible agency. The removal of those records to archival custody, administrative or physical, acknowledges that there is value in the oversight derived from a post-hoc approach, and that the archivist assesses the records from a time and place removed from their creation to provide the perspective needed to frame them in a wider social and cultural context. The two approaches can work together to allow for a seamless progression, as long as society recognizes both the organizational and societal value of the records.

If it is not the archivist's or recordkeeper's job, then, to ensure that those actions that should be documented are documented, how can society, a government, or an agency establish mechanisms to ensure its actions and transactions remain accountable? Ultimately, a broader organizational accountability

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will come when agencies establish “watchdogs” to oversee the agency’s operations, including but not limited to recordkeeping. Archivists, political scientists, and management experts have proposed several models. One is the establishment of a position parallel to the auditor general—the “archivist general”—who would serve as the government’s “recordkeeping” watchdog.³⁰ Another is the expansion of the role of auditor to look not just at financial accountability, but to link more forcefully an agency’s actions with the documentation necessary to confirm the appropriateness of those actions. Other suggestions include the creation of records commissions or, following the British model, accounting officers: internal overseers who can require that decisions be documented before action is taken.³¹ Such approaches, coupled with stronger legislative and regulatory frameworks and the establishment of a formal and prescribed records audit process, reporting outside of the agency or department, could someday move the primary accountability for the accurate and honest documentation of actions from post hoc through continuum to the elusive but essential *ab initio*.³²

Whereas traditional archival description might be seen by some as too little too late, the continuum approach alone also does not accommodate the three distinct functions at play in ensuring organizational accountability: first, the oversight of agency operations, including setting standards for accountability and ensuring compliance; second, the management of the organizational records for the purposes of efficiency, economy, and institutional accountability; and third, the preservation and interpretation of the records as evidence of something that once happened, whether good or bad, right or wrong, as a means of protecting and contextualizing “the proof.”

³⁰ For more on the role of Canada’s auditor general, see the official Web site at <http://www.oag-bvg.gc.ca/domino/oag-bvg.nsf/html/menue.html>, accessed 29 March 2004.

³¹ On the topic of records commissions, see, for example, Sue McKemmish, “Recordkeeping, Accountability and Continuity: The Australian Reality,” in *Archival Documents: Providing Accountability through Recordkeeping*, ed. Sue McKemmish and Frank Upward (Melbourne, Australia: Ancora Press, 1993), 18–19. For a discussion of the idea of accounting officers, see Donald J. Savoie, *Breaking the Bargain: Public Servants, Ministers, and Parliament* (Toronto, Ontario: University of Toronto Press, 2003), 259.

³² The introduction of access to information legislation was seen by many in the records community as an important mechanism for protecting evidence and records. Unfortunately, it has sometimes proved the opposite, as agencies have destroyed records, or not created them in the first place, rather than have them on file and so open to public scrutiny. Another gap, then, in the quest for accountability is the lack of coherence between access legislation and records legislation. Access laws say “if you have the record you must make it available,” but records laws do not say “you must create *and* keep the record.” For a recent discussion of access legislation, see, for example, Kerry Badgley, Margaret J. Dixon, and Paulette Dozois, “In Search of the Chill: Access to Information and Record-Keeping in the Government of Canada,” *Archivaria* 55 (Spring 2003): 1–20; and Ian Forsyth, “Access Law and Lost Records: A Commentary on ‘In Search of the Chill’ ” *Archivaria* 55 (Spring 2003): 21–26. See also Savoie, *Breaking the Bargain*.

Conclusion

As John F. Kennedy argued so eloquently nearly half a century ago, to state the facts frankly, and to give a faithful accounting, is a matter of trust—honoring the past while keeping faith with the future. In the world of records and archives, there is more than one way to achieve accountability and cultivate trust. A wide range of descriptive processes should exist, performed at different times and for different reasons. No one model, post hoc or continuum, will function sufficiently on its own.

It is our recognition of our role as records professionals in a wider process, and the inevitable limitations on our role, that will allow us to blend our different accountabilities into a larger, more holistic framework. Then we can continue to improve our accountability, and that of our organizations, a goal one hopes will not be simply a flavor of the month but instead will result in a fundamental and much-needed change in organizational management.