The State of Appraisal Today

In 1986 David Bearman first put the argument that core archival methods of appraisal, description, preservation and access were fundamentally unable to cope with the volumes of records archivists were required to process. He called on the archival profession to completely reinvent its core methods.

At this time in Australia the first codification of recordkeeping was being developed, with a shared concept of appraisal at its core. AS4390 defined appraisal as:

the process of evaluating business activities to determine which records need to be created and captured and how long the records need to be kept, to meet business needs, the requirements of organisational accountability and community expectations.

Appraisal was then acknowledged as the core of the recordkeeping endeavour. Appraisal was understood as a proactive recordkeeping process, assessing business and community requirements at or before record creation and ensuring the creation and maintenance of records required for an organisation’s business. It seems that particular understanding of appraisal is no longer shared across the archival spectrum. At the same time, identifying and managing access requirements as a core function of recordkeeping did not receive the same attention in the codification exercises taking place. In retrospect this seems more than a little odd, but the neglect of serious analysis of access as a recordkeeping function has left archivists ill-prepared for the complexities of the current regulatory regime. Negotiating the overlap and contradictions of archival, freedom of information and privacy protection legislation in the era of rights to personal information protection, large-scale digitisation and revelations of mass surveillance by the State is an extraordinarily complicated task. Further, if it is not undertaken as an aspect of appraisal when identifying recordkeeping requirements, then attempting it with actually existing records after the event is onerous, fraught and frequently less than satisfactory. While our Recordkeeping Roundtable workshop did not consciously separate the two aspects, appraisal and access seem to be conceptualized separately. Our Issues papers have bowed to this separation but inevitably they will touch on both aspects.

The challenges which the workshop identified and discussed for both aspects of recordkeeping were:

- Emphasising the human dimension of archives, acknowledging the place of emotion in archives
- recovering the shared concept of appraisal embracing the complex public access framework
- Exploring boundaries
- How well do our records/archives systems meet the new requirements?

**Emphasising the human dimension of archives, acknowledging the place of emotion in archives**

One of our speakers made the incontestable point that we need to acknowledge the human dimension of the archives, of the place of emotion. This should not have been a surprise, as the archives have always had the role of the place of memory, and what is more emotional than memory? However the other aspect of memory is that it is contested, and we should also acknowledge, it is not as accurate as we as individuals want to assert. The place of reliable, authentic, authoritative records in fixing institutional memory is accepted as a truism of our profession, yet hidden below this is a reality that was denied or unrecognized within the institutional walls. Interactions of citizens or residents of a country with the state are interactions between entities which are not equal. Inevitably the records of the interactions created by the state will form the basis of the state’s “memory” of them with or without the voice of the citizens or residents, a recognition it has taken more effort for archivists to achieve than it should.

An instance is the longstanding appraisal problem of case files in the post-war world of the welfare state. In paper format their volume dictated an appraisal that identified the policies and procedures governing the processing of cases as the long-term records while the case files themselves were identified as relatively short-term, retention for a limited number of years after the case was closed. Would we appraise those activities the same way today in the context of rights of access and privacy, and of the on-going struggle by Aboriginal people to contest the official history, and of children separated from their families to locate
them? With digital records storage is no longer the issue that forced the destruction of case files in the past.

Appraisal begins with the questions: what is the purpose of making and keeping records, why do people want them, what will they do with them, what will they do without them? Who else besides the formal creators needs them and why? Highlighting the human dimension of archives, acknowledging the place of emotion in archives, both point in the direction of one area of archival research which dwarfs all others with members of the public, family history, and to the most highly used records, immigration records.

In contemporary Australia the most publicly contested political ground is the response to the mass movement of peoples as refugees which is “managed” across a range of government agencies, outsourced operations including to other countries, a wide variety of NGOs and multiple jurisdictional issues from UN conventions and Declarations of Rights, International laws of the sea, down to local state policing actions or medical and hospital services for people in regional and international detention centres. No area of official administration of law and government services could be more complicated but at the centre of it are people whose fates are tossed around in this maelstrom, whose stories are presently hidden from us but many of whom will eventually become part of our polity so their individuality will be preserved in our records. If our appraisal framework can make an adequate response to the complexity of this arena of activity, then we will have started to come to grips with contemporary appraisal.

**Conceptually recovering the Australian appraisal framework**

The question today is: are archivists undertaking appraisal at all?

It seems to us that more of archivists’ time is spent on assessing the continuing value of records in their custody than appraising business activities to identify recordkeeping requirements into the future. The focus in archival institutions on older records – more often paper than digital – has lost sight of the older AS 4390 concept of appraisal and reduced much of the practice to authorising destruction, a long way from the digital reality of the contemporary workplace. The experience of determining the “value” of existing records, reviewing inherited accumulations of records, or deciding on the retention or destruction of individual record items which may be ten or more years old, is poor preparation for appraising activities and developing records requirements in the current business environment. While it is highly likely that the assessment of retention periods and identification of records of activities requiring long term retention are correct, applying those judgments to the fragmented recordkeeping of most contemporary organisations is increasingly impractical.

There are many reasons for this, which the discussion of appraisal boundaries identifies, but if we do not start with the recognition that what many of us do is far removed from both our own Standards and from contemporary administration, whether government or private enterprise, then it is difficult to assess those reasons constructively. Recovering our original Australian concepts of appraisal will stand us in good stead for responding to these difficulties, not least by providing a systematic approach to the complexities of current recordkeeping practices and access regimes.

**Identifying appraisal boundaries**

Effectively appraisal is no longer the uncontested province of archivists. There are boundaries constraining our intervention into contemporary recordkeeping such as:

- multiple professional responsibilities
- technical capacities and realities
- information devolution and decentralised business processes
- commercialisation and proprietary systems
not keeping up with recordkeeping capacities

data volumes and the risks of data storage.

**Professional responsibilities**

Today there are many professionals competing over what had formerly been the responsibility of records managers and archivists. We struggle to ‘get a seat at the grown ups’ table’, in order to advocate for improved governance and accountability in business systems. We are on the fringe of many corporate IT business system projects, and top management is seldom aware of the significance or costs of inadequate recordkeeping for both the project’s completion and its subsequent operations.

The ICT industry has thus assumed control of many areas which previously have been seen as either management or recordkeeping responsibilities, such as business specifications and definition of information requirements. If business information requirements are considered, these tend to be understood as a technological issue and not as a matter of governance, operations and asset management. In the digital environment recordkeeping is necessarily a collaborative endeavour, a partnership between recordkeepers and business and ICT staff. In practice recordkeepers are seldom identified as stakeholders and gathering business specifications is often limited as a cost-cutting measure, and just as often backfires particularly on creation of adequate records.

This is frequently complicated by the use of third party service providers, to provide technology or to perform business operations on an organisation’s behalf. The outsourcing of business processes and the relinquishing of the technical capacity to design and retain records, which may also be held in an external system, further limit the reach of appraisal. It therefore potentially jeopardises access over time to business records, and data longevity. The lack of recordkeepers’ profile in contemporary organisations results in outsourcing decisions being made without appropriate recordkeeping safeguards being included in contractual arrangements.

Contemporary operating environments are challenging for appraisal and implementation of recordkeeping requirements.

**Technological complications**

The failure to undertake appraisal for recordkeeping requirements as part of the design of many business systems results in creation of inadequate records, records which cannot be adequately managed in the system nor easily exported from it. Post factum appraisal in these circumstances is also constrained by the costs and difficulties of migrating the records in the predecessor systems. Legacy systems may be abandoned in these circumstances, if the cost of maintaining them cannot be justified by continuing business use.

Contemporary business tools such as wikis, network environments, mobile apps or collaboration tools are commonly adopted under team or project-defined rules. Many of these business-defined tools are routinely purged or deleted at the conclusion of a project, because project staff (who may also be contractors of a third party provider) are unaware of any ongoing use. In these cases lack of adequate governance of the project compounds the operational risks.

**Information devolution and decentralised business processes**

In the digital environment records creation is now very much a devolved and decentralised process. For example, government transactions that were once managed by forms, templates and a central file are now performed via personal email accounts, section-based business systems, campaign-specific social media

---

accounts as well as large corporate databases. There is little central regulation of all relevant business information, so users are generally free to use their own descriptive terms and management approaches and therefore there are no easy means to link all components of a transaction.

The broad adoption of 'bring your own device' (BYOD) strategies in business is also escalating the fragmentation of corporate recordkeeping and is leading to the radical diversification of recordkeeping environments. This fragmentation impacts on corporate knowledge and on an organisation’s ability to locate the records it needs to provide evidence of its business processes.

As a profession we need to develop a different approach to appraisal to provide the means of identifying and keeping the evidence needed for the business activities without trying to impose centralisation on an organisation, in any case not likely to be welcomed. Appraisal should be a tool to reconnect and manage fragmenting records of the business operations.

**Commercialisation and proprietary systems**

Today the majority of commonly used business applications are commercial products. The commercial drivers behind these applications cause frequent product change and innovation which in turn drives frequent data migration and re-configuration. Some commercial products are also designed to limit interoperability with other vendors’ products. These factors drive up the costs of retention of records or data over software upgrades.

Elena Danielson has warned against this ‘the commodification of information’, ² and argues that it is a potential disaster for the identification and maintenance of long term value digital records. She argues that the commercial incentives behind today’s lack of standardisation and the increasing opportunities for information to be ‘owned’ can, potentially, irreparably damage the ability of organisations to access their own business information over time. Appraisal should be deployed as a risk management or abatement strategy in response to both the fragmentation and the complexity of the business system environment.

**Not keeping up with recordkeeping capacities**

Today’s business systems generate extensive metadata³ but in the absence of conscious appraisal, there is little attempt to determine what metadata needs to be kept to maintain the meaning and value of those systems’ data or records, nor to leverage the utility of the metadata itself over time. The systems (and the management frameworks) that were used to transact operations in business applications need to be documented as the business systems themselves constitute records of how organisations perform business operations. Our appraisal practice need to embrace both these aspects and thereby demonstrate how we can add value beyond the quantitative use of reducing costs by destroying data no longer needed. This will not work with disposal practice based on the separation of metadata and records of the paper world, which still seems to haunt appraisal.

**Data volumes and risks of data storage**

David Rosenthal of Stanford University, in response to current trends to ‘keep everything’, has analysed the costs of storing all today’s data in the cloud. Rosenthal concludes that ’keeping 2011’s data would consume 14% of 2011’s gross world product. Given the IDC’s estimates that annually, data is averaging a 57% volume increase, Rosenthal calculates that ‘endowing 2018’s data will consume more than the entire GWP for the year’. He summarises by saying, 'We are going to have to throw stuff away'. By prevaricating, not

---

³ Standard business tools such as email applications and social media systems like Twitter natively apply more than fifty individual metadata elements to each message. First Monday article [http://firstmonday.org/ojs/index.php/fm/article/view/4366/3654](http://firstmonday.org/ojs/index.php/fm/article/view/4366/3654)
confronting the problem and allowing digital data volumes to grow, Rosenthal concludes, 'We may be in the bad situation of being unable to afford either to keep or to throw away the data we generate'.

The accumulations of data which constitute personal information, now regulated by privacy legislation in most jurisdictions, poses significant risks to the organisations holding them if they fail to protect from unauthorised access or accidental loss. Organisations like Telstra and the banks have been embarrassed by breaches of large quantities of personal information which ought to have been better secured or destroyed when no longer required.

Appraisal should be the expert strategy to address and manage the growth rates and risks but professionally we are struggling to apply our strategies in digital business environments. This could be the opportunity we need to demonstrate how the risks inherent in the poorly managed growth of data accumulations can be mitigated by appraisal solidly based on the regulatory regime and the actual business needs of the operations generating the data.

How well do our records/archives systems meet contemporary appraisal requirements?

Why are we poorly positioned to deal with the appraisal-related challenges we face?

To examine why, this section asks:

- How is appraisal defined and understood in archival institutions?
- How do archival institutions engage with business environments?
- How do business staff understand recordkeeping?
- What to do with the backlog?
- Records of continuing value – is digitisation the answer?

**How is appraisal defined and understood in archival institutions?**

As stated above, much of the appraisal practice occurring in archives today does not actively engage with digital business realities. Appraisal policies in many archival institutions still define appraisal as a process to preserve a documentary cultural heritage rather than identifying appraisal as laying the basis for practical and accountable recordkeeping, now and into the future. This definition perpetuates the view that appraisal is a post-hoc process, divorced from current business environments and fails to respond to the recordkeeping difficulties we have outlined. And regardless of institutional orientation, whether to efficient recordkeeping or to preservation of cultural heritage, archival authorities have suffered significant cuts in every jurisdiction.

Archival organisations therefore need to reorient their relationship to the contemporary environment.

**How do archival institutions engage with business environments?**

Archival institutions are still working towards integration with corporate enterprise governance and enterprise ICT implementation strategies. Unless we achieve this, records requirements will not be built into current business and system frameworks and appraisal will remain a retrospective consideration. Archival institutions and records staff across organisations should instead reconsider how to demonstrate that both business needs and business enhancement can be met by appraisal for records requirements as an element of system design.

---

How do businesses understand recordkeeping?

As stated above, recordkeeping, such as it is in contemporary organisations, is de-centralised and poorly understood in relation to the business priorities. “Records” are frequently understood to mean paper, not the business systems, nor email, let alone social media content. Use of third party providers and project management tools to undertake development of systems or deliver major new programs of work further removes critical recordkeeping from the routine administration of organisations and exposes them to business risk and compliance failures.

Senior staff and chief executives seem unaware of the risks their organisations are facing through the decentralised and irregular recordkeeping in many business environments. There is also no sense of the long term in most organisations. Systems, budgets, executive teams, projects and business strategies increasingly operate for 3-5 year periods before ceasing or changing fundamentally. The need for access to information beyond these timeframes is simply not understood and backup tapes are regarded as the principal mechanism for meeting their risks or longer term needs.

Archival institutions need urgently to develop strong relationships with business environments to respond to these challenges.

What about the backlog?

In the majority of organisations there are extensive backlogs of paper records. These often lack adequate control and description and have not been assessed against appraisal criteria to determine whether they can be destroyed or if they require continuing retention. The volume of these legacy records cost annually tens or hundreds of thousands of dollars in accommodation in-house or in commercial storage. Consequently dealing with the backlogs has dominated appraisal processes and obscured a failure to engage with contemporary recordkeeping issues.

Paper legacies will soon be dwarfed by poorly managed digital legacy systems. These systems urgently need a risk managed, proactive appraisal approach to identify and retain core records and allow the remaining data to be destroyed. These approaches then should be applied to the paper legacy records. Before long, however, with decreasing budgets and increasing data volumes, archival institutions will be held to account for what will be perceived to be their bureaucratic approach to legacy information management. How will this impact on the effectiveness and acceptance of proactive appraisal strategies we are trying to deploy in current environments? Alternatively, archival authorities may be forced into accepting legacy records into custody and dealing with the costs and consequences of this action.

Archival institutions need a legacy management strategy. This will likely be a compromise approach from the perspective of traditional archival requirements, but it is critical in terms of obtaining more strategic outcomes.

Records of continuing value – is digitisation the answer?

Archival institutions today operate under difficult financial circumstances. Paper holdings are degrading and require extensive preservation operations, while digital archiving operations are non-existent or poorly funded.

In another era microfilming was seen as the answer to the increasing costs of storage of paper. Today digitisation is seen as the answer to both the costs of storage and also to increasing access to archives for the public. We must be circumspect in our response to this apparent answer to our problems. The strategic difficulties of deciding what should be digitised reproduces the dilemmas of the past but are compounded by the popularity of online access. Archival institutions must not ignore this broad audience in favour of preservation of what they regard as the most important records or users. Digitisation is cost–effective as far as storage is concerned but requires laborious preparation and even more careful metadata management than paper-based records. How to enable online access is already a key question of appraisal.
Are we asking the wrong questions? Should we be thinking about providing access to what we have appraised as records of continuing value in a different way? Are custody or archival control the only answers to preservation of those records designated as archives? What about the other records which certainly have long-term use and which have never been in archival custody – registers of births, death and marriages, passport registers, electoral rolls, or land use records dealing with water management or toxic waste? What can we learn from these examples about how we could approach our tasks differently?

Returning to the example raised at the beginning, appraisal of the multi-jurisdictional, multi-layered activity of responding to asylum seekers, what should we do to ensure the voices of the other side of government activity are included in our consideration and are preserved beyond government custodial arrangements? We need to explore the way all stakeholders in such fraught arenas of action can be included, and can exercise control over their own part in the story. Adopting a risk management approach to appraisal of business activities should mean not avoiding accountability but addressing the matter of protecting the rights of all parties. If an activity like dealing with the asylum seekers is seen only through the eyes of the principal government agency and in terms of a custodial response, then an impossibly distorted view will be preserved. We must think beyond the four walls of the government institutions, and just as governments everywhere out-source activities, consider “crowd-sourcing” as one possible alternative strategy. Appraisal cannot stop with the identification of the records of continuing value. We know from the difficulties under which archival institutions currently labour, that the cost and means of sustaining access is part of the exercise.

**Defining solutions**

What about community engagement in archives? What long term functions with critical community requirements are moving to high risk environments? Engaging with key organisations, such as those providing community services, support for Aboriginal community, or children in detention, looms large because of the Royal Commission into institutions’ failure to deal with child abuse. No area links the twin recordkeeping issues of appraisal and access management so completely. But there are other fraught areas of government activity where communities are at odds with government agencies and have long term interests in adequate recordkeeping to call government to account, such as management of coal and coal seam gas extraction, protection of water supplies or responses to identified dangers of climate change.

Here are some directions which we consider could direct discussion about recovering an appraisal framework which addresses the complexities of government and other organisational activity and contemporary recordkeeping:

- Providing and implementing a strategic recordkeeping vision in contemporary organisations
- Fostering an understanding of long term recordkeeping’s advantages and responsibilities in organisations
- Determining and marketing a risk-based documentation strategy for functions or jurisdictions that set priorities in areas of highest community and business’s long term needs.
- Building support for recordkeeping by design in business and system environments.
- Determining a risk based policy on design data to allow its appropriate retention or destruction.

Solutions to these problems need to be fast and they need to be radical to attract attention and responses, so it’s up to us. Discuss.

*Paper prepared by Kate Cumming and Anne Picot*

*Reference group: Adelaide Parr*
Colleen McEwan  
Emma Harris  
Aaron Braden  
Emma Murray  
Julie McCormack  
Angela McGing  
Amanda Barber  
Sue McKemmish  

*Paper published by The Recordkeeping Roundtable, September 2013*