Toward the Archives of Archives: The New Archival History, Accountability and the Documentation of Archival Appraisal

by

Christy Morgan Henry

A Thesis submitted to the Faculty of Graduate Studies of

The University of Manitoba

in partial fulfilment of the requirements of the degree of

Master of Arts

Department of History (Archival Studies)

Joint Master's Program

University of Manitoba/University of Winnipeg

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ABSTRACT

This study investigates the status of the archives of Canadian archives, or records created and maintained by these archives to document their own functions. This has taken on greater importance because of the changing role of archives in society and emergence of what may be called the new history of archives. Growing appreciation of the impact of archives on knowledge formation and societal conditions has prompted new interest in archival history and placed greater emphasis on the accountability of archives for appraisal decisions (among other actions) that profoundly shape the record available in archives. The thesis reviews archival literature for discussion of archival history, and more specifically, the archives of archives. It reports on surveys of Canadian archival institutions conducted in 2003 and 2008 to determine how well Canadian archives have maintained and made accessible their own archives. The surveys were particularly concerned with how archivists document and archive records of the appraisal function. Finally, because of the ways in which appraisal determines the documentary record, documentation of that function was considered in a case study of the S.J. McKee Archives of Brandon University in Manitoba. The central conclusion of the thesis is that for the most part the archives of archives have not been a priority in the literature or in Canadian archival institutions. Thus archives are operating largely in a manner inconsistent with their obligation to society to be accountable for appraisal decisions that affect societal memory and future historical understandings. This then undermines the promise of the new history of archives to examine that key role.

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CHAPTER 1

INTRODUCTION

As Canadian archival educator Terry Cook writes, archivists play a major role in building " 'a living memory for the history of our present.' The resulting 'houses of memory' . . . [would and do] contain 'the keys to the collective memory' of nations and peoples, and to the protection of rights and privileges."[1] Cook's conception of a new dynamic and active role for archivists was inspired by the postmodern turn in archival thinking in the 1990s. Postmodernist archivists suggested that reality comes to us through various mediations, including archival records and the work of archivists with them. And, if reality is mediated, then the mediators should be held to account for the influence they exert. Society should have some way to hold governments and other organizations, including archives, accountable for their actions. Since the subjective decisions made by archivists in their daily work shape understanding of the record, and thus the perception of the reality that records convey, archivists need to be accountable for those decisions.[2]

American archival educators Richard Cox and David Wallace state that "the chief value of records is, in fact, a broad accountability binding individuals with each other and with governments, organizations and society across space and time."[3] Records assume a secondary value over time as archives of those same governments, organizations and

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[1] Terry Cook, "What is Past is Prologue: A History of Archival Ideas Since 1898, and the Future Paradigm Shift," *Archivaria* 43 (Spring 1997): 18. Cook is quoting the then National Archivist of Canada, Jean-Pierre Wallot.

[2] See Brien Brothman, "Orders of Value: Probing the Theoretical Terms of Archival Practice," *Archivaria* 32 (Summer 1991): 78-100. Brothman was the earliest major exponent of these ideas in the Canadian archival profession. Also see Terry Cook, "Paper Trails: A Study in Northern Records and Northern Administration, 1898-1958," In *Canadian Archival Studies and the Rediscovery of Provenance*, Nesmith, Tom, ed. (Chicago: Scarecrow Press, 1993): 269-296.

[3] Richard Cox and David Wallace, eds., *Archives and the Public Good: Accountability and Records in Modern Society* (Westport, CT: Quorum Books, 2002): 4.

individuals. However, it is the archivist who decides what portion of those records, which serve both accountability and memory functions, are to be preserved in archives. Therefore, what responsibilities do archivists, as defenders of accountability and shapers of social and cultural memory have to the society that they serve?

It seems evident that if archivists are modifying and indeed even destroying cultural memory, do they not, as a profession, have an obligation to society to document and make known what they are doing to shape our collective memory? Furthermore, if there is a possibility that archivists might be held to account for their actions,[4] then it would be prudent of them to create and maintain records that document their actions and decision-making processes. It is the ethical thing to do; archivists have an ethical responsibility to the societies that they serve. With the advent of access to information legislation, the kinds of records that document archival work have also become a legal requirement.[5] Despite these arguments, and the inroad of postmodern ideas, documenting archival activities and decisions has been a low priority in Canadian and other archives.

Why is this so? Traditionally archivists relied on what might be called a content-based intellectual foundation for their work. Archivists performed the various archival functions largely based on their knowledge of the content information of records. This approach was viable while the number of records under consideration for archival retention remained small. As the volume and variety of records, users and their subject interests increased dramatically across the late twentieth century, the content-based

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[4]For examples, see Cox and Wallace, eds., *Archives and the Public Good.*
[5]For example, in order to comply with Manitoba's Freedom of Information and Protection of Privacy Act (FIPPA), institutions (including the Archives of Manitoba) require records management systems to locate records both for access purposes and the approved destruction of those without lasting value. The records management system provides both access and an accountability trail for destroyed documents should the records be requested under the Act.

approach was unable to cope. As a result of these new demands and stresses, archivists shifted the intellectual foundation of their work from knowledge of the information contents of records to contextual knowledge about records, record's creators and archival functions.[6] These developments are also forcing archivists out of their conception of their more neutral role.

Although archivists today agree that a contextual approach, rather than a content-based approach to archival functions, is the only way to cope with the challenges created by modern records, there is tension within the profession between conventional and postmodern conceptions of various aspects of contextual archival theory. This debate has played out, at least in part, in archival literature, in differing attempts to establish an intellectual framework for method and practice to guide archivists in their day-to-day work. Conventional attitudes will be examined here first, followed by a discussion of the impact of postmodernism on conventional archival practice and theory using studies and articles by archivists, as well as other professionals whose work provides insights into the kind of knowledge base archivists require. Before doing that however, it is interesting to note that this tension may partially explain why Canadian archivists have not fully embraced the idea that the records archivists themselves create in doing their work – the archives of the archives – have value. As will be discussed, conventional ideas, by nature, do not generally emphasize the importance of the kind of documentation that would adequately record archival choices and actions.

The conventional archival view is that records provide largely unproblematic access to what happened in the past. Some records may, of course, be forgeries and some

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[6]Tom Nesmith, "Hugh Taylor's Contextual Idea for Archives and the Foundation of Graduate Education in Archival Studies," in Barbara Craig, ed., *The Archival Imagination: Essays in Honour of Hugh A. Taylor* (Ottawa: Association of Canadian Archivists, 1992): 13.

may have inaccurate information in them, but with careful analysis these problems can be addressed and truthful historical accounts obtained. This would be the case, especially, if archivists do their work well. The records would be highly trustworthy pathways to the past if archivists do not insert their own biases into their work (thus distorting the record) and adhere to sound theory and practice, particularly through the application of the cardinal archival principle of provenance, which protects the key to the proper understanding of a record – knowledge of its origins.[7]

The problem is, of course, that archivists inevitably insert their biases into their work (when selecting certain records for admission to archives and others for destruction, to take but one example that is central to this thesis). And archival concepts (such as the idea of provenance) are interpretable and applicable in various ways. The implication of the traditional approach for archivists is that their role is largely invisible and passive or neutral; their job is simply to receive, retrieve, and guard or preserve records so that they may faithfully reflect the past. The implication of this view is that not a great deal occurs in archival work to shape knowledge from records. As a result, there is little emphasis in archival literature on proper recordkeeping by archivists that would allow them to be held accountable for their actions. This view of the limited impact of archivists also helps explain why so few archivists have written archival history and why there are so few works on the history of archives.

A different way of looking at records and archives, which still utilizes the contextual approach, comes from postmodernism. At the heart of postmodernism is a

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[7]For an example of this view, see Terry Eastwood, "What is Archival Theory and Why is it Important?" *Archivaria* 37 (Spring 1994): 122-130. In the English-speaking world, these ideas received early and powerful expression in Sir Hilary Jenkinson, *A Manual of Archival Administration Including the Problems of War Archives and Archive Making* (Oxford: The Clarendon Press, 1922).

criticism of the objectivity of knowledge, the existence of one right answer and the idea

that our means of communication only marginally affect what can be known.[8] The

implications of these critiques for archives and archivists are outlined by Canadian

archival educator Tom Nesmith:

> For the postmodernist, reality is not something we can simply observe and
> report directly, using the always reliable tools of communication, which
> faithfully do our bidding. For the postmodernist, reality is not simply
> what we find out there, when we search for it, it is something that is
> largely made by various contributors to its creation, including us. There is
> a real world out there, of course, but it comes to us (not directly) but
> through countless communications or mediations. (Reality is mediated
> because a communication is a representation of a thing, not the actual
> thing itself.) And you and I are among those mediators of reality. Who
> we are, where we are in time and space, what interests us, what means of
> communication we have at our disposal, how we use them, and what other
> resources we may have to help us search, shape our interaction with the
> world around us. These mediations of our contact with reality enable us to
> construct the world, not simply as it truly is, but as it is to us in our time
> and place.[9]

If records mediate or activate an understanding of reality, then the conventional

assumptions about and definitions of records and archives need to be rethought.

Emphasis switches from 'a record *is* something' to 'a record *does* something;' instead of

passively reflecting reality, the record shapes its user's understanding. Furthermore, each

person will activate a record differently, both socially (given their varying social

experiences) and technically (given the varying technologies an individual has available

and uses to read and understand the record). This process will also evolve with social

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[8]Tom Nesmith, "Introductory Comments on Postmodernism and Postmodernity:" 2, unpublished paper
delivered at "What's It All About?: 'Postmodernism' and Archives," sponsored by the Association for
Manitoba Archives, 19 February 2001. Additional archival writings dealing with postmodernism include:
Brien Brothman, "Orders of Value," 78-100; Terry Cook, "Archival Science and Postmodernism: New
Formulations for Old Concepts," *Archival Science* 1, no. 1 (2000): 3-24; and "Fashionable Nonsense or
Professional Rebirth?: Postmodernism and the Practice of Archives," *Archivaria* 51 (Spring 2001): 14-35;
Bernadine Dodge, "Places Apart: Archives in Dissolving Space and Time" *Archivaria* 44 (Fall 1997): 118-
32; Verne Harris, "Claiming Less, Delivering More: A Critique of Positivist Formulations on Archives in
South Africa," *Archivaria* 44 (Fall 1997): 132-41.
[9]Nesmith, "What's It All About?" 4-5 (emphasis original).

and technical change. Thus, a record is not a static reflection of its origin, but "an evolving mediation of understanding about some phenomena -- a mediation created by social and technical processes of inscription, transmission and contextualization."[10]

The definition of the archives also undergoes a transformation in postmodernist theory. Instead of a storage place, the archive itself becomes "an ongoing mediation of understanding of records" (as previously defined above), "and thus phenomena, or that aspect of record making that shapes this understanding through such functions as records appraisal, processing, description ...."[11] As a result of this new definition, archival work mediates the understanding of records. Therefore it is imperative that those actions, and the decisions behind them, are well documented. Without this information, knowledge of the context of the creation of the record, and thus the understanding of the record, will be much poorer. Moreover, this new definition also means that archivists are co-creating the records along with everyone else engaged in the creation process, or history of the record; archivists are no longer neutral guardians under this definition. The archive becomes a place that does, rather than a place that simply is.

In recent years archivists have rightly stressed the role of archival records in helping to hold institutions accountable for their actions.[12] But much less attention has been devoted to discussion of how archives can be held accountable for their own actions. This omission underlines one of the central problems with the understanding of the relationship between archives and accountability. Archivists accept and even embrace

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[10]Tom Nesmith, "Still Fuzzy, But More Accurate: Some Thoughts on the 'Ghosts' of Archival Theory," *Archivaria* 47 (Spring 1999): 145.
[11]Ibid.
[12]For example, Terry Eastwood, "Reflections on the Development of Archives in Canada and Australia" in Sue McKemmish and Frank Upward, eds., *Archival Documents: Providing Accountability Through Recordkeeping* (Melbourne: Ancora Press, 1993): 27-39.

their role as a player in holding other institutions accountable. In order to fulfill this role these institutions need to draw on records for their work. However archivists may or may not themselves actually stress adequately the importance of records, or the archives of archives, in holding archives accountable for their own work. Yet archives are no different from any other institutions and the archives of archives - those records created and managed by the archives to document their decisions and actions - are the key to the accountability of archives in the same way that the operational records of a government agency or a business are the key to their accountability. Without those records, archives are incapable of explaining and defending their decisions. Furthermore, they will be caught in a contradiction, advocating the importance of holding other institutions to account, yet unable or unwilling to hold themselves to the same standard.

ACCOUNTABILITY MECHANISMS

Although the creation and maintenance of records documenting archival decisions and actions for accountability reasons is rarely discussed or advocated, there are a number of accountability mechanisms in place that, in theory at least, should ensure that archives and archivists can be held to account. They include: archival laws; access to information and privacy acts; auditors; professional associations; researchers; and the media. Each of these mechanisms will be discussed below.

Archival laws tell society what functions and responsibilities to hold archives accountable for. For example, the Library and Archives of Canada Act includes among the purposes of Library and Archives Canada the responsibility for acquiring and preserving Canada's documentary heritage and facilitating the management of

information by government institutions.[13] Similarly, Manitoba's The Archives and Recordkeeping Act lists: identification and preservation of records of archival value for present and future generations, and encouraging and assisting other organizations in good recordkeeping practices as core responsibilities. The Act also states that one of the purposes of the Archives of Manitoba is to "promote and facilitate good recordkeeping respecting government records in order to support accountability and effective government administration."[14] This is an important addition as it emphasizes the reality that accountability (and effective administration) are dependent on good records management; without the necessary records being created and maintained there is no full accountability. The value of these and similar acts is that by outlining the functions and responsibilities of the archives governed by them, they allow anyone – archivist, government official, and citizen – to measure what is supposed to be done against what is actually being done. These laws force archives to answer for their decisions and actions. When they fail to fulfil their legal obligations the courts can also play a role in holding archives accountable.

Legal obligations for archives also arise from access to information and privacy acts. The South African History Archives, which lobbies for greater public access to government records in that country, outlines the importance of access to records as follows: "Access to information is an essential element of a vibrant democracy. When implemented effectively, it facilitates transparency, accountability and good governance. It is an enabling right that, in principle, affords all people the opportunity to access

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[13]Library and Archives of Canada Act, (2004), "Objects and Powers" section 7 (a) and (e) available at: http://laws.justice.gc.ca/en/showdoc/cs/L-7.7/bo-ga:s_7//en#anchorbo-ga:s_ (Accessed: September 14, 2008).
[14]The Archives and Recordkeeping Act, (2001), "Archives of Manitoba" section 5 (b).

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information that can be used to respect, protect, promote and fulfill other human rights."[15] As accountability mechanisms for archives, the Canadian and Manitoban archival legislation usually imply the need for access to the records of archives and records management systems that make possible provision of access and protection of privacy. Other laws also support these objectives. For example, Section 2.1 of Canada's Access to Information Act states that,

> The purpose of this Act is to extend the present laws of Canada to provide a right of access to information in records under the control of a government institution in accordance with the principles that government information should be available to the public, that necessary exceptions to the right of access should be limited and specific and that decisions on the disclosure of government information should be reviewed independently of government.[16]

Privacy legislation, which is now in place in all Canadian jurisdictions, regulates the collection, use and disclosure of personal information held by government agencies. It thereby protects the privacy of individuals and allows them access to their own personal information.

Access to information and privacy acts mean that archives too should be held to account for their role in the administration of these acts since archives in many jurisdictions have responsibility for implementing them for government records in their custody. The privacy and access to information acts, like the laws establishing archives, allow society to monitor the actions and decisions of archives and make it possible for them to hold archives to account if they suspect that they are not fulfilling their responsibilities.

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[15]South African History Archive website, "The Freedom of Information Programme (FOIP)," available at: http://www.saha.org.za/about.htm (Accessed: September 13, 2008).
[16]Department of Justice Canada, *Access to Information Act* available at: http://laws.justice.gc.ca/en/showdoc/cs/A-1/bo-ga:s_3::bo-ga:s_3_2?page=1 (Accessed: September 13, 2008).

Many access to information and privacy acts point to another accountability mechanism that can be used to hold archives to account, namely the individuals or offices that oversee, or should oversee the work of an archives. They include: auditors general, information commissioners, privacy commissioners, and ombudsmen. The Information Commissioner of Canada, for example, investigates complaints from individuals who feel that they have been denied their rights under the Access to Information Act. The Privacy Commissioner of Canada, among other things, reports publicly on how private and public sector organizations handle personal information, conducts audits and promotes public awareness and understanding of privacy issues.[17] At the provincial level, for example, the Manitoba Ombudsman's Office is responsible for looking into complaints and reviewing compliance with protection of privacy and access to information rights under The Freedom of Information and Protection of Privacy Act and The Personal Health Information Act. Like its federal counterparts, the Manitoba Ombudsman promotes accountability through its power to investigate, recommend and report publicly. As both access to information and privacy legislation govern archives, these offices and officers have the power to ask archives to answer for their compliance with the legislation and statutes they are governed by.

One of the duties of the Auditor General of Canada is to conduct performance audits of federal departments and agencies, including Library and Archives Canada (formerly the National Archives of Canada). The audit findings, which include "good practices, areas requiring attention, and recommendations for improvement," are reported

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[17]Office of the Privacy Commissioner of Canada, "About Us: Mandate and Mission of the OPC" available at: http://www.privcom.gc.ca/aboutUs/index_e.asp (Accessed: May 26, 2008).

to Parliament.[18] In the 2003 November Report of the Auditor General of Canada, the National Archives was audited as part of the chapter on the protection of cultural heritage in the federal government. The Auditor General concluded that Canada's built, archival and published heritage was at serious risk, and made a number of recommendations on how the National Archives could change policies and practices to improve the situation. The report also stated as one of its main points that the review "should also aim to make federal parties that play a role in the protection of cultural heritage accountable."[19] The Office of the Auditor General of Ontario similarly criticized operations at the Archives of Ontario in its 2007 Annual Report, noting that sometimes records necessary to evaluate the practices and performance of the Archives could not be found or were not created in the first place.[20]

Advisory boards and records commissions are another means of holding archives to account. The Saskatchewan Archives Board (SAB) is one Canadian example of this type of accountability mechanism. Comprised of a number of citizen representatives,[21] the SAB's board is "responsible for supervising the archives of Saskatchewan and the

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[18]Office of the Auditor General of Canada, "What We Do" available at: http://www.oag-bvg.gc.ca/internet/English/au_fs_e_371.html (Accessed: May 26, 2008).
[19]Auditor General of Canada, "Chapter 6 – Protection of Cultural Heritage in the Federal Government, Main Points, 6.3" in *2003 November Report of the Auditor General* available at: http://www.oag-bvg.gc.ca/internet/English/aud_ch_oag_2003_6_e_12929.html. (Accessed: May 26, 2008).
[20]For example, retention schedules for certain agencies could not be easily located due to the disorganization of the Archives' binders. See Office of the Auditor General of Ontario, "Chapter 3 Section 3.01Archives of Ontario and Information Storage and Retrieval Services," 42. The report contains additional instances in which the Archives of Ontario had not developed plans or procedures required in order to fulfill certain responsibilities. See the website for the Office of the Auditor General of Ontario. "Chapter 3 Section 3.01Archives of Ontario and Information Storage and Retrieval Services." (2007), available at: http://www.auditor.on.ca/en/reports_en/en07/301en07.pdf (Accessed: January 16, 2009).
[21] The Saskatchewan Archives Board is the legal title of the provincial archives of Saskatchewan. The board's Board of Directors is comprised of no more than nine members that must include: one nominee of the University of Saskatchewan; one nominee of the University of Regina; and two members of the public service of Saskatchewan.

work of the Provincial Archivist."[22] Essentially, the board acts as a check on the powers of the Provincial Archivist; through their directions to the Provincial Archivist the Board of Directors can influence the supervision and operation of the Saskatchewan Archives Board. The City of Winnipeg Records Committee, which oversees the work of the City of Winnipeg Archives and Records Control Branch of the City Clerk's Department, also has two citizen representatives. As established by The City of Winnipeg Charter Act, this committee makes "recommendations to council, and implements policies and procedures approved by council for the management, retention, safekeeping, disposition and destruction of records."[23]

Similarly royal commissions, which are the highest level of public inquiry in Canada, can also hold archives to account. The Deschênes Commission in the mid-1980s investigated whether Canada had been a haven for Nazi war criminals. It examined the decisions and actions of the then Public Archives in relation to the destruction of immigration case files. Archivist Robert Hayward of the Public Archives testified before the commission, and later observed that "the Commission certainly gave the Archives exposure. Never before have Canadian archivists been called upon to explain publicly the way they do their job. Never before have editorials been written calling into question the work most of us have grown to consider routine and commonplace."[24]

Professional associations for both archivists and records managers can also help to hold archives to account. Ethics codes that hold members to account, and indirectly

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[22]The Archives Act, 2004, Part III Administration, section 12(1) and 14.
[23]The City of Winnipeg Charter Act, Division 2 Records Management, 110(2)(b) Records committee established, available at: http://web2.gov.mb.ca/laws/statutes/2002/c039023.php (Accessed: September 14, 2008).
[24]Quoted in Terry Cook, "'A Monumental Blunder': The Destruction of Records on Nazi War Criminals in Canada," in Cox and Wallace, eds., Archives and the Public Good: 55.

the institutions those members work in, offer one way in which professional associations can hold archives to account. Unfortunately, existing codes of ethics for archivists and records managers have not followed through on this opportunity. Neither the Records Management Association of Australasia[25] nor ARMA International's[26] codes of ethics mention professional accountability through record keeping at all. The Society of American Archivists' code[27] also fails to discuss this. Both the Australian Society of Archivists[28] and the Association of Canadian Archivists[29] advocate the creation of records to document the appraisal process. The Canadian code also promotes the creation of acquisition records and in the preservation section it states that archivists should document all actions that may alter the record and all decisions and actions taken with regard to deaccessioning. Neither code discusses what should be done with those records after their creation nor how long they should be maintained. Only the International Council of Archives code of ethics explicitly states that "archivists should keep a *permanent record* documenting accessions, conservation and *all archival work done*" (emphasis added).[30] The rationale behind this point is the need for archives to be able to justify the work they have done.

A secondary problem with existing codes of ethics is that they are all voluntary. Furthermore, although self-regulation by the profession may apply to large breaches of

[25]Records Management Association of Australasia, *Code of Professional Conduct and Practice* available at: http://www.rmaa.com.au/docs/membership/codeofconduct.cfm (Accessed December 18, 2008).
[26]ARMA International, *Code of Professional Responsibility* available at: http://www.arma.org/about/overview/ethics.cfm (Accessed: December 15, 2008).
[27]Society of American Archivists, *Code of Ethics for Archivists* available at: http://www.archivists.org/governance/handbook/app_ethics.asp (Accessed: December 15, 2008).
[28]Australian Society of Archivists, *ASA Code of Ethics* available at: http://www.archivists.org.au/asa-code-ethics (Accessed: December 15, 2008).
[29]Association of Canadian Archivists, *Code of Ethics* available at: http://archivists.ca/about/ethics.aspx (Accessed: December 15, 2008).
[30]International Council on Archives, *Code of Ethics* available at: http://www.ica.org/en/node/30046 (Accessed: December 15, 2008). Code 5 states that archivists should record, and be able to justify, their actions on archival material.

the code, it is unlikely to play a part in day-to-day operations.[31] There really is no way to ensure that archivists comply with the points in a given code of ethics even if they do advocate the creation of archives of archives.

Professional statements about best practice or standards are another way that professional associations can encourage accountability in archives. One example of such a standard is the International Organization for Standardisation's (ISO) records management standard 15489. Archivists can also use self-scrutiny and mutual (constructive) criticism at conferences and in journals and books to hold themselves and their institutions to account.

Researchers, particularly with the help of access to information laws, can also hold archives accountable. In fact, there are a number of examples of lawsuits launched by researchers over access to archival records, especially in the United States. In some instances archival associations have joined the fight. One prominent organization involved in this kind of work is the National Security Archive located at The George Washington University. An independent non-governmental research institute and lobby group, the National Security Archive "collects and publishes declassified documents obtained through the Freedom of Information Act. The Archive also serves as a repository of government records on a wide range of topics pertaining to the national security, foreign, [sic] intelligence, and economic policies of the United States."[32] As part of its mission to increase access to historical records, the National Security Archive is a leading advocate and user of the Freedom of Information Act. It has instigated

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[31] See Mary Neazor, "Recordkeeping Professional Ethics and their Application," *Archivaria* 64 (Fall 2007): 47-87.

[32] The National Security Archive website, "About the National Security Archive" available at: http://www.gwu.edu/~nsarchiv/nsa/the_archive.html (Accessed: September 10, 2008).

precedent-setting lawsuits to obtain access to records on topics such as the Cuban Missile Crisis, the Iran-Contra Affair and White House e-mail records created during the Reagan, Bush and Clinton administrations.[33] The South African History Archive has also taken an active role in trying to ensure ready access to archival materials. As part of its Freedom of Information Programme (FOIP) the Archive provides services that include "assessment of possible litigation and availability of legal services where internal appeals are rejected by a body and access to information is refused."[34]

The media can also be used to hold archives to account. In 1986, while the Deschênes Commission inquiry was taking place, archivist Terry Cook, then of the Public Archives, wrote an article[35] in the Globe and Mail explaining the actions taken by the Public Archives regarding the destruction of immigration case files dating back to the Second World War. Press reports contained criticism of the Public Archives for destroying files that allegedly contained information pertaining to the immigration of Nazi war criminals to Canada.[36] The Public Archives was eventually able to defend its actions, in part by using records it had created and maintained to document actions that affected the records scheduling and records destruction process. Cook wrote later that lawyers from the government and the royal commission,

> were particularly interested in the 1982 disposal of records – and in minute detail (who called whom, when, why), the numbers of boxes of records before and after the disposal action, the exact sequence of steps and dates in the disposal and subsequent archival transfer, changes in the National Archives decisions on the time to retain Immigration records, the reasons and methods for archival sampling . . . They also requested and received

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[33]Ibid.
[34]South African History Archive, "About FOIP: The Freedom of Information Programme (FOIP)" available at: http://www.saha.org.za/about.htm?about/foip.htm (Accessed: December 15, 2008).
[35]See Terry Cook, "For the Record: Archivists Honourable," The Globe and Mail, (11 August 1986).
[36]Cook discussed the event in more detail in his article "'A Monumental Blunder'" in Cox and Wallace, eds., Archives and the Public Good: 37-65.

copies of six documents, for example, records schedules, accession forms, and internal correspondence.[37]

The existence of these records played an important role in helping the royal commission understand the Public Archives' actions, which in turn led it to conclude that the Archives had not acted improperly in destroying the immigration case files.

Cook's *Globe and Mail* article illustrates two components of the relationship between the media and archival accountability. In addition to holding archives to account for their actions, which the press was attempting to do by publishing criticism of the Archives on the subject, the media can also provide a means by which archives can show that they have been accountable. While Cook does an admirable job of using the media to advantage in this situation to justify the actions and decisions of the Public Archives, the entire debate demonstrates that the media, and the public, do not really understand how archives work. The media criticized the Public Archives without really considering the context in which retention and destruction decisions are made.[38] According to Australian archivist and records manager Charlie Farrugia, at least part of the reason for the media's shortcomings when it comes to holding archives to account for their actions seems to be the inability of the press to establish a connection between archives,

[37]Ibid., 48.

[38]A 1997 *Globe and Mail* article written by Estanislao Oziewicz is another example of how the media has missed the mark in terms of holding archives to account. Entitled "Files missing in Dionne Case," the article is about missing archival documents pertaining to the Dionne quintuplets' quest for legal compensation from the Ontario government on the grounds that they had been exploited for financial gain and that their trust fund had been mismanaged while they were wards of the province. At the centre of this particular controversy was the inability of the Archives of Ontario to locate minutes of guardianship meetings from 1934 to 1937 and the fact that David Croll, the first government appointed guardian of the quintuplets, took and subsequently burned relevant files when he was removed from the cabinet in 1937. While Oziewicz criticizes the government and its actions in the article, the actions and practices of the Archives of Ontario are not called into question. In this particular instance the media failed to hold the archives to account, however its ability to do so is evident. Oziewicz's article appears in the December 22, 1997 issue of the *Globe and Mail*.

recordkeeping and accountability.[39]   The press tends to see records as information resources, not as tools of accountability.   Therefore, as in the case of the Nazi war criminals the press failed to put the destruction decision into context or as in the Dionne quintuplet case, the role of the Archives of Ontario and the quality of government support and resources for the archives were virtually ignored as issues in the matter. Although the press may be a means of holding archives to account, it has not been very successful at it and until it understands better how archives operate, it will be difficult for the media to act as effective accountability agents.

Australian archivist Chris Hurley discusses an additional aspect of the accountability of archives, namely how does the reporting relationship of an archives affect its ability to be accountable? Hurley argues that it is not enough just to hold the implementer of good recordkeeping requirements accountable for good recordkeeping. He stresses that the agent of accountability, be it an auditor, an ombudsman, or an archivist, also needs to be made accountable.[40]   In other words, he wants "an accountability not only for the action or situation itself, but a separate accountability for keeping records of such actions and situations."[41] However, in order for accountability agents to be effective they must have some form of independence or autonomy from the institutions they are charged with monitoring; according to Hurley, this independence in turn requires that accountability agents need to be answerable to established standards

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[39]Charlie Farrugia, "Print Media Perspectives on Recordkeeping," in McKemmish and Upward, eds.,
Archival Documents: 188-95. Joan Schwartz and Terry Cook echo this sentiment in their article "Archives,
Records, and Power: The Making of Modern Memory," stating that "archives as institutions and records as
documents are generally seen by academic and other users, and by society generally, as passive resources
to be exploited for various historical and cultural purposes." See Joan Schwartz and Terry Cook,
"Archives, Records, and Power: The Making of Modern Memory," *Archival Science* 2 (2002): 1.
[40]Chris Hurley, "Recordkeeping and accountability" in Sue McKemmish, et al. eds. *Archives:
Recordkeeping in Society* (Wagga Wagga, New South Wales: Centre for Information Studies, Charles Sturt
University, 2005): 243.
[41]Ibid., 228.

and procedures for their practices. Without those standards there is no way to determine if agents of accountability are themselves acting responsibly.[42] Unfortunately, "government archival authorities in most Western democracies do not have this kind of independence. . . A reasonable thesis can, therefore, be developed that most government archives authorities are neither fit nor capable of acting independently as agents of democratic accountability."[43] The important point to draw from Hurley's discussion is that in order to hold others to account, an archives needs some degree of independence, but with greater independence from external control comes the question of who then holds the archives to account and how?

Records are one of the primary means of activating or making effective accountability mechanisms for any institution or organization. This is no less true for accountability mechanisms affecting an archives. If records are not being made and kept then archives cannot be held to account. Therefore, although the mechanisms described above are worthwhile and potentially effective means of ensuring archival accountability, they are not substitutes for archives of archives. Rather, they reinforce the need for them and further underscore the idea that archives can no longer think of their own records as unimportant, something to be tackled only after all of the other archival work has been completed.

The postmodernist theory of archives requires accountability, as does democratic society. And as society becomes more aware of the roles archives and archivists play in the management of collective memory it is more than likely that they too will be called upon to defend themselves and the work they have done. However, despite the influence

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[42]Ibid., 247.
[43]Ibid.

of postmodernism on archival theory and the general acceptance among archivists that archives are vital players in insuring accountability, little has been done to ensure that archives and archivists themselves are also held to account for their actions and decisions. Accountability mechanisms exist that should provide a means of holding archives to account, however without archives of archives – that is better documentation and management of an archives' own records - these mechanisms will never be fully functional. One area of work where this is especially important is appraisal: "because of the complexity of appraisal, its societal importance and its subjectivity, archivists and their institutions should be held accountable for their decisions through full and transparent documentation of their contextual research, appraisal process, keep-destroy decisions, and resulting transfers of records . . ."[44] This thesis will discuss this idea more fully in subsequent chapters, especially in Chapter 4. It will convey the low priority traditionally placed on two key accountability mechanisms in the international archival literature and by Canadian archives: study of the history of archives and the creation and maintenance of archives of archives. The documentation of one specific archival function – appraisal – will then be discussed in a practical example.

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[44]Terry Cook, "Macro-appraisal and Functional Analysis: documenting governance rather than government," *Journal of the Society of Archivists*, 25, no. 1 (2004): 7.

CHAPTER 2

FROM the OLD ARCHIVAL HISTORY to the NEW

The archival profession, more so than most professions, is past-oriented; it is a profession based on the records of the distant and recent past. "Memory, like history," Schwartz and Cook write, "is rooted in archives. Archives contain evidence of what went before. Archives validate our experiences, our perceptions, our narratives, our stories. Archives are our memories."[1] As the keepers of memory, archivists are charged with a significant responsibility and possess a unique understanding of the past. Yet despite this close association with the past, until recently the profession has been largely uninterested in its own history as a means of explaining (or accounting to society for) the way in which archival work has been done and the impact of archiving on institutions and society.

This chapter will examine key examples from the international archival literature to determine what they say about the documents to be used in archival work and how those documents themselves should be archived. This analysis will include a selection of some older classic archival manuals, as well as more recent ones, and examples of studies in archival history. On the whole, documenting archival work has been a marginal concern in archival literature, but one receiving greater emphasis in recent years, though still not sustained attention.

CLASSIC ARCHIVAL MANUALS

A selective overview of archival literature reveals that studies of archival history are limited in number and value. In addition, there are very few studies of the records an

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[1] Joan M. Schwartz and Terry Cook, "Archives, Records, and Power: The Making of Modern Memory," *Archival Science* 2 (2002): 18.

archives needs to create and keep. The key works of archival literature are not histories of archives, but textbook-style manuals on how to do archival work. These manuals reveal that the archives of the archives, or the records that archives should create and maintain to document their own actions and decisions, are not often discussed. This is particularly surprising considering that many of the manuals mention the important role that archives play in ensuring that certain agencies and institutions, such as governments, are held accountable through record keeping, as well as the ways in which archives act as important houses of collective memory. Therefore, the inconsistency with which Canadian archives approach their own working documents is not surprising, considering the lack of attention this subject has received in archival manuals.

If archives are houses of memory and heritage, and if archivists, through their actions and decisions are shaping and determining that memory and heritage, then it seems reasonable to ask, or even demand, that they record what they are doing. Similarly, if archives have the power to essentially help create societal memory then would it not be prudent of the archival profession to make sure that archivists have the documentation to support their decisions should they ever be called to account for what they have done?[2]

Probably the three most influential archival manuals in the twentieth century have been the 1898 *Manual for the Arrangement and Description of Archives* (the "Dutch Manual") by Muller, Feith and Fruin,[3] Sir Hilary Jenkinson's 1922 *A Manual of Archive*

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[2]This point is equally valid for both public and private archives. Although private archives, such as corporate archives, may not have mandates that place particular importance on maintaining records for social remembrance, creating and maintaining an archives of these archives would still be necessary for those institutions for accountability reasons. Public archives, in contrast, need to be mindful of potential accountability issues, as well as their social responsibilities.
[3] This thesis uses the 1968 reissue of the manual: S. Muller, J.A. Feith and R. Fruin, *Manual for the Arrangement and Description of Archives* (New York: The H.W. Wilson Company, 1968).

Administration,[4] and T.R. Schellenberg's 1956 *Modern Archives: Principles and Techniques*.[5] Neither Muller, Feith and Fruin nor Schellenberg make mention of creating and maintaining records documenting archival work other than finding aids for public research. In the case of the Dutch authors, this may largely be a result of the fact that their manual deals exclusively with arrangement and description; these areas of archival work do not appear to generate the same kinds of decision-making that say, appraisal and conservation do. Schellenberg's manual, although it deals with a variety of functions, does not discuss any additional records for documenting archival work.[6] This lack of discussion is telling in and of itself. These authors obviously did not place a high priority on the value of archives of the archives.

Of the 'classic manuals' only Jenkinson's considers the documentation that archivists should create as a part of their work. This is somewhat unexpected considering that Jenkinson emphasized the role of the archivist as a neutral custodian, who advocated, for example, that appraisal decisions should be made primarily by the records' creators, not archivists.[7] These beliefs suggest a minimal role for archivists that would result in creation of few records of lasting value to document their work.

Jenkinson had a very strong commitment to the role of the archivist as protector of the integrity of records as evidence of the actions of their creators. He saw this as especially important in arrangement and preservation work, as archivists can notice missing (misplaced, stolen) records, store some in special ways or places for preservation

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[4]This thesis uses the 1966 reissue of the revised second edition: Hilary Jenkinson, *A Manual of Archive Administration* (London: Percy, Lund, Humphries & Co. Ltd., 1966).
[5] This thesis uses the 1975 reprint: T.R. Schellenberg, *Modern Archives: Principles and Techniques* (Chicago: The University of Chicago Press, 1975).
[6]Schellenberg's other major book *The Management of Archives* (New York: Columbia University Press, 1965) does not address these issues either.
[7]Jenkinson, *A Manual of Archive Administration*: 156.

reasons, apart from their original locations on a file, and may repair (and thus change) some. These things should be recorded and the information made available to researchers so that they use a record with maximum integrity.

Thus Jenkinson's philosophy of archives does involve the creation of records, but it focuses on the creation of only a relatively few such records and mainly for basic control purposes: accessioning, file lists from agencies, call slips to identify who is using the records, whether they are printed anywhere, and to locate them in the vaults – that is what his "archivist's registers" are for. At the same time, he does not elaborate much on the form, content, structure, and (records) management of these basic records, although it is fair to say that he implies they are archival in the sense that they should be retained indefinitely because they will always be needed to help control records and explain repairs and so on.

More important, though, Jenkinson also does not say anything about the other (and much more voluminous) kinds of records used to run an archives -- all the broader policy and management records, which document even more fundamental questions about how and why the archives is run. It is especially intriguing that he does not say anything about their creation and (records) management because, according to his own philosophy of archives, the creator of these records -- the archives in this case -- is to determine whether they are to be archived. For this central part of Jenkinson's own conception of archives, there is a glaring blank.

This seems to suggest that if Jenkinson's vision of archives is implemented, the archives of archives would be a low priority. Some basic control records would be emphasized and kept, but the value of the rest seems quite unclear at best. And that

seems to fit his overall philosophy -- the properly run Jenkinsonian archives needs some basic control records to carry out its chief task of being a transparent conduit of information from the past in records to the present and future. If it puts those basic control records in place, and abides by Jenkinson's guidance on applying provenance, conceiving of archives as the creation of the records creators (for their purposes primarily), protecting certain qualities in the records, such as impartiality, and avoiding an emphasis on archivists' or users' own research interests, then this conduit would function as it should, and there would not need to be many other important records, beyond the basic ones, made (or especially) kept long as archives -- since they would not have much to reveal about an archives that, in effect, does not really do anything significant beyond keeping out of the way and providing basic control.

Jenkinson's manual argues strongly for the documentation of archival work in three specific areas: repair (preservation/conservation); the 'archivist's notes' (as a means to aid the "moral defence" of the archives); and the archivist's own registers. In the case of repair, one of Jenkinson's rules is, "in every instance where what he has done in repair might escape observation to append a signed and dated explanatory note: *he must on no account cover his tracks*."[8] (Jenkinson's emphasis.)

According to Jenkinson, the second area, the archivist's notes, "occur in all periods and frequently give most valuable information . . . they may be of general Archival interest . . .but those which chiefly concern us are such as preserve record of a particular incident in the career of a particular document."[9] Rather than making these kinds of notes without attention of particular rules, Jenkinson makes three

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[8]Ibid., 68.
[9]Ibid., 95-96.

recommendations. First, that such notes should be made regularly, especially whenever anything occurs that might possibly modify the character of the document. Second, that the notes have no authority unless they have been dated and signed; they should also be 'of permanent character.' Third, they should be made on a slip of paper attached to the record, rather than on the document itself.[10] In this area, Jenkinson's methods call for the creation and maintenance of an archives of the archives to document archival work.

The third relevant area Jenkinson discusses is the registers of the archivist. These documents should enable the archivist to give the archival history of any document at any moment. Jenkinson's recommendations on documentation include documenting where the archival record came from, whether any part of it is known to be missing, and what has been done to it by way of repair. He does not specifically call for the creation of records that would document other archival actions.

RECENT ARCHIVAL MANUALS

The subject of the archives of archives also receives spotty attention in more recent manuals. In the 1990s, the Society of American Archivists published a number of manuals in its Archival Fundamentals Series (AFS), each concentrating on a specific archival function. These books updated the Basic Manual Series published in the 1970s and 1980s and were meant to be "a foundation for modern archival theory and practice."[11] The book in the AFS by Thomas Wilsted and William Nolte focuses on the overall management of archival repositories. It discusses the archivist's role as a manager, as well as various tools that could be used to fulfill managerial responsibilities. Although Wilsted and Nolte mention an archives' own records as records to be managed

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[10]Ibid., 96.
[11]Mary Lynn Ritzenthaler, *Preserving Archives and Manuscripts* (Chicago: The Society of American Archivists, 1993): vi.

and consulted in the planning process, they do not discuss how to document specific functions or how they should be archived. In fact, the only reference to managing the archives of the archives comes under the heading "Organizing Paperwork." There they state that "many archivists have responsibility for records management within their parent institutions. In developing record retention schedules and procedures, the archives' own records should not be overlooked."[12] Nothing more is said on the subject.

The SAA followed the initial AFS with updated volumes (AFS II). Following the same basic premise, this second series of books incorporated new developments in archival thinking and theory. Wilsted and Nolte's manual was updated by Michael Kurtz. In his edition of *Managing Archival and Manuscript Repositories*, Kurtz more explicitly treats archives as institutional units to be managed like any other, stating that "management is basically about people, what they do, and the organizations in which they work. From that perspective, an archives is like any other organization. The archives has its mission-related tasks to perform . . ."[13] Unfortunately, aside from reusing Wilstead and Nolte's advice that archival records should also be scheduled as part of a records management system, he does not discuss the types of records an archives should create or how they should be administered within a records management program.

Another title in the SAA's AFS is James O'Toole's *Understanding Archives & Manuscripts* (Chicago, 1990). This title was also updated in AFS II by O'Toole and Richard J. Cox. The purpose of both editions is to provide an overview of the knowledge needed by archivists, as well as their responsibilities. Both have a chapter devoted to the

[12]Thomas Wilsted and William Nolte, *Managing Archival and Manuscript Repositories* (Chicago: The Society of American Archivists, 1991): 13.
[13]Michael J. Kurtz, *Managing Archival and Manuscript Repositories* (Chicago: Society of American Archivists, 2004): 7.

historical development of American archival practice, but neither discusses the creation or maintenance of archives of archives. AFS II emphasizes the social nature of recorded information, that archives are rooted in society, and that study of the history of records and recordkeeping are part of the core knowledge every archivist needs. However, both manuals overlook archival accountability, and the role in that of the creation and maintenance of records to document archival work. The omission is disappointing, particularly in the O'Toole and Cox edition, as that manual states that its purpose is to examine new trends in archival knowledge and debate. By not considering the archives of archives, the manual suggests that the topic is not yet an important one.

Like the two SAA series, *Keeping Archives*, an Australian text edited first by Ann Pederson (1987) and in the second edition by Judith Ellis (1993)[14] has had a wide international reach. But unlike the American series, both editions of the manual make repeated reference to how important it is for archivists to maintain a document trail, which includes maintaining "adequate records which document our actions and transactions and which provide evidence of the processes involved."[15] In the Pederson edition, acquisition[16] and appraisal are discussed together in a chapter by Barbara Reed. In her chapter, Reed considers documentation for both functions. The archives of archives are generally perceived as offering guidance to archivists as they do their work in the

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[14] A third edition of *Keeping Archives* was published in late 2008, however it was not available at the time this thesis was written.

[15] Judith Ellis, ed., *Keeping Archives*, 2nd edition (Port Melbourne, Victoria: D.W. Thorpe, 1993): 132.

[16] According to Reed, acquisition documentation should be focused on the acquisition policy, as it provides documented criteria and easily understood reasons for acquisition decisions. (p. 75) She further suggests creating an acquisition file for documenting this archival function. Documents within the file would include: records documenting contact with the donor, records documenting the evaluation of the material, records documenting the legal and physical transfer of the material and records documenting the archival management of the material. This last category of documents would extend the documentation of archival decision making about the records into additional archival functions, such as description and access. (p. 109)

present and in the future. The manual does not consider the purpose of the archives of

archives to be accountability to researchers or the public or historical studies of archiving

of wide academic or public interest. Reed's consideration of appraisal is based on an

understanding of the subjective nature of appraisal. She states,

> once this danger is recognised, steps must be taken to minimise the subjectivity of appraisal decisions. Specific criteria to establish value should be developed against which the worth of every record series is measured. Recording this information both for records which are accepted as archives [and] those which are rejected provides appraisal documentation which allows future generations of archivists to understand the basis of the decisions of the past.[17]

The manual goes on to discuss in some detail three appraisal tools: the records

survey, the disposition schedule, and the appraisal checklist. The first two tools are often

discussed in archival literature, generally in connection with records management and

institutional records. The appraisal checklist, which would act as a measuring stick for

records series or collections under consideration, as well as the basis for any appraisal

arguments, whether for or against retention, could also be applied to institutional records

in the absence of a formal records management system. However it is also one of the few

appraisal tools discussed for documenting private records.

Reed suggests the following elements for the appraisal checklist: do the records

conform to the acquisition policy; do the records detail the origins, structure or policy of

the creating body or the evolution of the interests of the individual; do the records

document the rights of organisations or individuals; do the records document the financial

responsibilities of the creating body or financial planning; are the records duplicated

elsewhere or maintained in another form within the records of the individual or creating

[17]Ann Pederson, editor-in-chief, *Keeping Archives* (Sydney: Australian Society of Archivists Incorporated, 1987): 81.

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body; are the records dependent upon filing codes or plans, indexes or registers; are the records 'case files'; what is the arrangement of the records; are the records complete; what quantity of material is involved; do the records contain confidential information which would require protection for commercial viability or for the privacy of the individual; what are the restrictions required by the donor; what is the physical form of the records; and what is the physical condition of the material?[18]

The appraisal chapter in the second edition of *Keeping Archives* was also written by Barbara Reed. By this time she is more concerned with allowing scrutiny of and providing justification for appraisal decisions[19] than in the previous manual where the arguments for archives of archives centred on their role in the internal operations of the archives. Reed supplements the earlier edition with the inclusion of a chart that shows archivists how they can measure and evaluate various archival functions, including appraisal. She also considers new appraisal approaches, such as functional analysis, and adds sections on the social context of appraisal decisions and accountability. Unfortunately, although the records survey, the disposition schedule and the appraisal checklist are still included, less attention is paid to how to archive those records as appraisal documentation.

Despite decreased emphasis in the second edition, Reed's chapters[20] in *Keeping Archives* are noteworthy as exceptions in archival manuals as they openly discuss not only the value of the archives of archives, but also detail how to create such records. This emphasis can be attributed to the fact that its editors pointedly state that "the archival

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[18]Pederson: 97-100.
[19]Ellis: 158.
[20]The creation and maintenance of records to document other archival functions are also discussed in other chapters in the manual.

programme is also about managing"[21] and that "in addition to its responsibility to manage the records of depositors, the archives also has an obligation to manage its own resources effectively and to document its work carefully, i.e. to measure and evaluate its effectiveness and to maintain and care for its own 'archives' documenting its work."[22] While this assertion is important, and *Keeping Archives* is more successful than most manuals in considering the archives of archives, it is still mainly a broad ranging text on how to perform archival procedures rather than on the nature and management of such records. Additional work is still needed.

This overview of leading archival manuals supports the conclusion that in general archivists have not been overly concerned with documenting their actions and archiving those records in order to improve the administration of their work, account for their actions to the public, and sustain advanced study of the history of archives. There has been some concern (at least as far back as Jenkinson) about documenting their work mainly for internal control purposes. This concern can be seen to be increasing in the work of the Australian archival community in particular in the late 1980s and the early 1990s, as it led a growing professionalization of archival work by developing some of the most advanced methodologies in the field. This still largely internal professional purpose to improve archival practice required better documentation.

ARCHIVAL HISTORY in the LITERATURE

This recent rising emphasis on documenting archival work is paralleled and supported by new thinking about archival history in the last few years. An older style of archival history, which was not highly dependent on ample archives of archives, is giving

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[21]Pederson: 2.
[22]Ibid.: 26.

way to a new one, which, to fulfill its promise, does now require that archival work be better documented and the resulting records adequately archived. The work of Berner, Wilson, Walch and Eastwood[23] in the 1970s and 1980s, are examples of the older archival history.[24] Each was intended as a contribution to a small corner of general cultural history and to be a means of professional education for archivists and of inspiring a greater sense of professional identity among them. Appeals by archivists in the 1980s and (early) 1990s for greater interest in archival history by their archivist colleagues called mainly for more of this traditional type of archival history.

James Gregory Bradsher and Michele F. Pacifico's essay, "History of Archives Administration," represents one strain of archival history in late twentieth-century archival writings. The purpose of their overview they argue is to provide "a context for archivists to discuss and comprehend present-day archival functions and management. Understanding the development of archival administration [will enable] archivists to

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[23]See: Richard C. Berner, *Archival Theory and Practice in the United States: A Historical Analysis* (Seattle: University of Washington Press, 1983); Ian E. Wilson, "Shortt and Doughty: The Cultural Role of the Public Archives of Canada, 1904-1935," *The Canadian Archivist* 2, no. 4 (1973): 4-25; Timothy Walch ed., *Guardian of Heritage: Essays on the History of the National Archives* (Washington, D.C.: National Archives and Records Administration, 1985). Reflecting the still limted purposes of the older archival history, Walch writes that this book "is, to be sure, a modest effort to honor the National Archives on its golden anniversary." (p. v).; and Terry Eastwood, "R.E. Gosnell, E.O. S. Scholefield and the Founding of the Provincial Archives of British Columbia, 1894-1919," *BC Studies* no. 54 (Summer 1982): 38-62.
[24]For additional examples see John Cantwell, *The Public Record Office, 1838*-1958 (London: HMSO, 1991); Donald R. McCoy, *The National Archives: America's Ministry of Documents* (Chapel Hill: University of North Caroline, 1978); and Ernst Posner, "Some Aspects of Archival Development Since the French Revolution" in *A Modern Archives Reader: Basic Readings on Archival Theory and Practice* edited by Maygene F. Daniels and Timothy Walch: 3-14 (Washington, D.C.: National Archives and Records Service, 1984). That Posner's article, originally published in 1941, was reprinted in 1984 in a book on then current archival administration, suggests how little work had been done on archival history in the intervening 43 years. Posner's *Archives in the Ancient World* (Cambridge, Mass.: Harvard University, Press, 1972) is one of the few archival histories that did make an important contribution to the wider world of scholarship – ancient history. However, it has only recently gained renewed currency among archivists, being reprinted by the Society of American Archivists in 2003. Prior to this, the work received modest attention from archivists and Posner did not really write it to be a major contribution to the contemporary archival profession's concerns. See James O'Toole, "Back to the Future: Ernst Posner's *Archives in the Ancient World*," *The American Archivist* 67, no. 2 (Fall/Winter 2004): 161-75.

better plan for their future."[25] This statement testifies again to how an understanding of the history of the archival profession is needed to fully comprehend and plan for the present and the future. Bradsher and Pacifico's study is a prime example of how most of the old archival history was too much about description rather than analysis. Without engaging their material in some form of analysis or evaluation, the benefits of their study are minimal; they offer no new insights, possibilities or directions for the archival profession.

"The Provenance of a Profession: The Permanence of the Public Archives and Historical Manuscripts Traditions in American Archival History," is both an endorsement of archival history and an example of it. In the article, Luke J. Gilliland-Swetland examines the continuing ideals of the two American archival traditions within the changing context in which their ideals were used. Unlike Bradsher and Pacifico, Gilliland-Swetland moves beyond simply describing behaviour to offering a contextual framework from which understanding of the reasons behind such behaviour can be achieved. To conclude his article, Gilliland-Swetland connects his historical analysis of the two competing traditions within the American archival tradition with a statement on the importance of archival history for the future of the profession. He states that in order for the archival profession to remain vital, the competing traditions must be reconciled; this reconciliation he feels will be achieved when the two traditions "lay aside their advocacy long enough to understand why they have taken the stance they have."[26]

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[25]James Gregory Bradsher and Michele F. Pacifico, "History of Archives Administration" in *Managing Archives and Archival Institutions*, James Gregory Bradsher, ed. (Chicago: The University of Chicago Press, 1989): 19.
[26]Luke J. Gilliland-Swetland, "The Provenance of a Profession: The Permanence of the Public Archives and Historical Manuscripts Traditions in American Archival History," *The American Archivist* vol. 54, no. 2 (Spring 1991): 179.

Although Gilliland-Swetland's article offers more than a retelling of events, his focus on archival history as a tool for self-evaluation and the development of a strong professional identity labels his work as old archival history; the focus remains insular.

Although there are examples of archival history in the professional literature,[27] there are few histories of Canadian archives in either the old or new approach to archival history. There are a small number of short articles for a few archives, but there are no monograph histories of any major public archives in the country. In fact, Deidre Simmons' *Keepers of the Record: The History of the Hudson's Bay Company Archives* is the first monograph history of a Canadian archival institution and it was published in 2007.

Simmons' book also illustrates how the distinction between the old archival history and the new is not black and white, but rather a matter of emphasis. In her own words, "the history of the Hudson's Bay Company Archives is an account of how the Company kept its records. It is also a history of the people who were responsible for making and keeping those records."[28] After 1930, the responsibility for keeping those records fell to an appointed archivist. Therefore the book is also a study of those archivists.

Although Simmons' book is written for a wider audience than archivists, it is traditional in approach. Her discussion of the Hudson's Bay Company Archives (HBCA) reads largely as an administrative history. Her focus when considering the management of the records since the creation of the Archives in 1931 centres on arrangement,

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[27]The few examples of the Canadian tradition of archival history have been old style on the whole, valuable in their way, but traditional in conception and deployment. For example see Wilson, "Shortt and Doughty" and Eastwood, "The Founding of the Provincial Archives of British Columbia."
[28]Deidre Simmons, *Keepers of the Record: The History of the Hudson's Bay Company Archives* (Montreal & Kingston: McGill-Queen's University Press, 2007): 3.

description, access and publication. Nothing of note is said about appraisal. The book only provides incidental accounting of how some archival actions have influenced the records. For instance, Simmons' reveals that "the variety of flimsy copies and notes written on the back of recycled letterhead paper, particularly in the search files" are the result of attempts on the part of Archives staff to do "all it could in the way of economy and improvisation."[29] This information, taken from the Archives own records, is an excellent example of how the archives of archives can provide researchers with additional context about records in the archives care. The Hudson's Bay Company Archives' own records were an invaluable resource for Simmons and thus point to the great potential of the archives of archives for deeper understanding of archiving. Despite her use of the HBCA's own archives, however, Simmons does not really investigate how the decisions and actions of the HBCA's archivists have influenced the Hudson Bay Company's records. It is this omission that makes her book a better example of the old archival history rather than the new.

The transition in thinking from the old history to the new can be seen in works by archival educators Richard J. Cox (of the University of Pittsburgh) and Barbara Craig (of the University of Toronto). The ideas of both of these authors contributed to the postmodern view of archives taking shape in archival circles and beyond at about the same time as they wrote the articles discussed below. In an essay originally published in 1988, Cox discusses the formation and development of the archival profession in the United States during the twentieth century. Cox cites various professional challenges or

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[29] Ibid., 252-53.

crises as one reason for the profession to examine its past[30] and argues that through research into the care of the documentary heritage, archivists can gain a better understanding of themselves and their institutions. This type of awareness, he believes, would be beneficial in addressing contemporary concerns and issues within the profession. All of these points could be classified as elements of the old archival history.

What makes Cox's work transitional is his broad definition of "archival history." Unlike most other authors to that point in time, Cox's definition encompasses more than just the history of the archival profession; he extends it to include the history of all efforts to preserve and manage historical records.[31] Cox begins by suggesting that the lack of attention archivists have paid to their own history is the result of the newness of the profession combined with the demands of other concerns and issues, largely of a practical nature. This problem is compounded by the fact that "there remains a distinct lack of any sense – at least any precise definition – of the value of archival history"[32] in the articles and monographs that do exist. Cox, however, sees a number of reasons to study archival history.

In addition to the more traditional reasons[33] mentioned above, Cox also argues that "archival history is a gateway through which to examine some fundamental questions about the nature of records and information."[34] He maintains that archival history can shed light on the role of information and records in assisting policy decision-making in governments and other institutions, as well as on the ability of records to document actual

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[30]Richard J. Cox, "On the Value of Archival History in the United States," *Libraries & Culture* (Spring 1988), reprinted in Cox, *American Archival Analysis: The Recent Development of the Archival Profession in the United States* (Metuchen, N.J.: The Scarecrow Press, 1990): 183.

[31]Ibid., 182.

[32]Ibid.

[33]Cox also advocates the use of archival history in professional self-evaluation and planning by archivists. (p. 189)

[34]Ibid., 193.

events. "The implications of this," he adds, pointing to the new wider relevance of archival history that he foresaw, "extend far beyond the archival profession." Archival history of this kind can also help archivists improve their own work through better understanding of "how decisions have been made, whether correctly or not, and how effectively all of this has been captured in the records."[35] Cox also argues that it is difficult for archivists to argue for greater interest in their histories and better record keeping and archiving by others in society while archivists pay so little attention these things into their own domain.[36]

This discussion of how archivists manage their own records moves beyond the old archival history. While it does not explicitly discuss how archives shape society and knowledge as a result of the work they do, Cox's point does open the door for the new archival history and its conversations on the relationship between archives, power, and accountability.

In 1992 Barbara Craig offered an endorsement of the importance of the study of archival history that also marks the transition from the old to the new archival history. Craig focuses mainly on the familiar profession-building reasons for studying archival history, but argues that this is now much more critical to the profession's very survival in the computer age. She sees archival history as an aid in understanding the archival profession and its institutions in order to better understand and address contemporary concerns and issues within the profession. In particular, Craig argues that "from a sense of continuity with archives history come[s] perspective and purpose. If we grasp the history of archives and of records-keeping, in all their abundant variety, we will be well

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[35]Ibid., 186, 194.
[36] Ibid., 195.

placed for a strong professional response to both the means and the modes of modern discourse."[37]

Although Craig restates the older arguments for the internal professional value of archival history, she notes that it must also look far beyond the borders of the profession for issues to examine and contributions to make. It should "stimulate the development of a more critical approach to our work and to the influences that affect it."[38] She adds: "Most important, history helps us to understand the contextual place of records in the world of affairs, of thought, and of information." Like Cox, Craig sees the key relationship of the study of archival history to day-to-day documentation of archival work and calls for better documentation. She states: "archival work is sometimes poorly documented. Why should we not turn one of the precepts of 'the documentation strategy' – that archivists should stimulate the creation of documents in areas where they are lacking – towards our own work?"[39]

The new vision of archival history pointed to by Cox and Craig, among others, has only recently emerged, prompted by the postmodern awareness of the impact of archival records and decisions on societal life. As Canadian archivist Brien Brothman has observed,

> social communities create and destroy value. Rubbish does not have an objective, autonomous existence. Dirt and rubbish are the products of socially determined exclusion, which provide clues about social value. . . For archivists, the principal aim is to achieve a condition of positive order in their domain. This they do through the exclusion of what is deemed to be debris, which constantly threatens to undermine the existing order. . . Records, or information, which archival disposal or destruction eliminates,

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[37] Barbara L. Craig, "Outward Visions, Inward Glance: Archives History and Professional Identity," *Archival Issues* 17, no. 2 (1992): 113.
[38] Ibid., 119.
[39] Ibid., 121, 119.

is deprived of a permanent place in the social order(s).[40]

This new vision of the power of archives espoused by postmodernists like Brothman, argues that archives and archival work are rooted in the culture and society that creates them. And because archival decisions and actions, especially in appraisal, reflect dominant cultural values and assumptions, archivists must interrogate their own methods and practices. This self-examination is necessary if archivists are to fully understand and provide informed service with the records in their care. As a result, Brothman too called for a new archival history: "The history of the record does not stop at the portals of archives. Archives are participants in that history …. [and] archives should be regarded as a proper object of historical and cultural analysis, whether such work be undertaken by archivists or other scholars."[41]

The new vision of archives and archival history emerging among archivists has been paralleled by the postmodern turn in many intellectual circles that has helped prompt wider interest in the study of archives outside the archival profession. One of the most well known influences on this writing since the mid-1990s is Jacques Derrida's *Archive Fever*, in which he outlines a powerful role for archiving activities in shaping human experience. For Derrida, "the question of the archive is not . . . a question of the past. It is not the question of a concept dealing with the past . . . it is a question of the future, the question of the future itself, the question of a response, of a promise and of a responsibility for tomorrow."[42] He is arguing that without an archived past there can be no idea of the future; that the 'nostalgic desire' for origins stems from the need

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[40]Brien Brothman, "Orders of Value: Probing the Theoretical Terms of Archival Practice," *Archivaria* 32 (Summer 1991): 81.
[41]Ibid., 91-92.
[42]Jacques Derrida (translated by Eric Prenowitz), *Archive Fever: A Freudian Impression* (Chicago: The University of Chicago Press, 1996): 36.

individuals have to put their own past into some kind of order before they can make sense of their present and future. The ordering of the past however is subjective, and therefore the way individuals archive their own past is constantly in flux and being reinterpreted. The archive is always elusive. Derrida was one of many scholars in various fields to turn their attention to archives. Carolyn Steedman, whose own work *Dust: The Archive and Cultural History* (Manchester, 2001), is a prominent example of writing about archives by academics outside the archival profession, notes this wider "recent 'turn to the archive' in the human sciences".[43]

This new perception of the power of archives and widening interest in the study of archives fostered an intellectual environment in which the new archival history, called for in the archival profession by Cox, Craig, and Brothman, among others, could and did emerge in the 2000s. Additional examples of work being done about archives in the new style by archivists and academics from other disciplines include *Archives, Documentation, and Institutions of Social Memory: Essays from the Sawyer Seminar* (Ann Arbour, 2006). The Sawyer Seminar held at the University of Michigan in 2000-01 brought together about 100 speakers to explore the impact of archives on social memory through the study of archival history. Approaching their subject from a postmodernist perspective, the book's editors (an archivist and a historian) preface the volume by stating, "what goes on in an archive reflects what individuals, institutions, states, and societies imagine themselves to have been, as well as what they may imagine themselves

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[43]Carolyn Steedman, *Dust: The Archive and Cultural History* (Manchester, 2001), p. viii. For a sample of similar interdisciplinary work reflective of the "turn," see the special archival theme issues of *History of the Human Sciences,* 11, no. 4 (1999) and 12, no. 2 (1999).

becoming."[44] A number of the essays explore how archival functions, such as appraisal and description influence the archival record that is available to users, as well as how the social and political climate can impact the archival record.

The establishment of the International Conference on the History of Records and Archives (I-CHORA), first held in 2003, is further evidence of the increasing awareness in the archival profession and broader academic disciplines of the importance and value of archival history. I-CHORA has explored various issues surrounding records and archives including the historical and social nature of records, documents, and record keeping, as well as the cultural impact of record creation and record keeping. The conference proceedings have also been published in leading archival journals,[45] which further attests to the value an increasing number of archivists and academics are placing on the value of archival history.[46] Despite the significance of these developments, however, the conferences have not focused on the records archives should be creating to document the work that they do.

Two other works merit attention because they reflect the effort to find applications and to reach audiences for the new archival history beyond archivists and academics. Richard Cox has answered his own late 1980s appeal for the new archival history by editing one and authoring the other. The first, which was mentioned above, is *Archives and the Public Good: Records and Accountability in Modern Society* (Westport, CT, 2002), which he co-edited with David Wallace. The second is Cox's *No Innocent*

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[44]Francis X. Blouin Jr. and William G. Rosenberg, eds., *Archives, Documentation, and Institutions of Social Memory: Essays from the Sawyer Seminar* (Ann Arbor: The University of Michigan Press, 2006): ix.
[45]*Archivaria* 60 (Fall 2005) contains papers from the first I-CHORA conference held in Toronto. *Archival Science,* 6, nos. 3-4 (December 2006) is a special issue devoted to papers from the second I-CHORA convened in Amsterdam in 2005. *Libraries and the Cultural Record* will publish the papers from the 2007 I-CHORA held in Boston. The conference met in Perth, Australia in 2008.
[46]Antoinette Burton, ed., *Archive Stories: Facts, Fictions, and the Writing of History* (Durham and London: Duke University Press, 2005) is an example of the new archival history as taken up by historians.

Deposits: Forming Archives by Rethinking Appraisal (Metuchen, NJ, 2003). Significantly, both books draw on archival history to attempt to bring information about the impact of archives in society to a wide public. They did not use archival history to appeal only to the professional interests and pride of archivists. *Archives and the Public Good* shows the important role archives play in public affairs by drawing on the connection between careful understanding and management of archival records and social justice issues such as Holocaust reparations and the hunt for Nazi war criminals, political scandals such as the Iran-Contra Affair, and American diplomatic history. In *No Innocent Deposits*, Cox tried to inform readers about the fact that archival holdings are made through selection decisions by archivists and others. He reflected the wider postmodern influence on archival thinking by contending that the appraisal function had to be rethought as a conscious (not "innocent") act of making archives for certain purposes. But like the other work on the new archival history discussed above, these two books do not contain an extended discussion of the records that document archival work and would enable archivists to be held accountable for their actions in regard to public affairs and the formation of archives through appraisal decisions.

The examples of archival history examined here demonstrate that despite recent promising trends the subject is still underdeveloped within archivists' professional literature and academic writing more generally. The most prominent works of archival literature in the twentieth century have not stressed the value of archival history (or of the archives of archives). Furthermore, ideas about archival history, until recently, have reflected and reinforced the low priority given to documentation of archival work. It is ironic that although better documentation is needed in order for archivists to be

accountable, and be able to help write the new archival history, the archival profession

has largely neglected this aspect of its work.

CHAPTER 3

INVESTIGATING THE ARCHIVES OF ARCHIVES AT CANADIAN ARCHIVES: SURVEY RESULTS

To evaluate the state of the archives of archives in Canada, a query was sent by email in March 2003 to thirty Canadian archives as part of a course assignment in Archival Studies. The list of archives contacted included all provincial and territorial archives, as well as the then National Archives of Canada, the Glenbow Archives, the Hudson's Bay Company Archives and a random selection of university and municipal archives. The email asked the archival institutions contacted to:

> send . . . the publicly available fonds or other descriptions of the holdings of [their] archives' own archival records -- that is, descriptions of the records created by [their] archives to administer [their] archival program. [The institutions were also asked to send] any publicly available descriptions of private records of archivists that [their] archives may hold.[1]

The purpose of the survey was to determine how well archives document and archive their own decisions and actions in the process of doing archival work. In particular, the survey attempted to discover "what documents archives are creating and maintaining when performing appraisal, arrangement, description, reference, public programming, and conservation activities."[2] This information was intended to be used to "study the role that archives play in shaping their holdings and programs and the ways in which archives can explain or account for these actions."[3] By 2008 many major Canadian archives had responded to the survey, providing a good basis for generalizations about record keeping by Canadian archives and the maintenance of their own archives of such records.

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[1] See Appendix A.
[2] Ibid.
[3] Ibid.

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Only one third of the original thirty archives contacted responded to the initial survey. The situation was further complicated by the fact that different archivists interpreted the initial letter in a number of ways. For example, one archives responded by providing information on how to access their descriptions on their website. However, they did not provide any information about the types of documentation their institution creates and maintains to document its own actions until a follow-up letter was sent. In contrast, a different archives recommended their policies and procedures manual as the likeliest location for the type of information that was requested. One possible explanation for these different interpretations may be the lack of commonly accepted standards or guidelines, aside from the "Rules for Archival Description" (RAD) that deal with archival operations.

Determining the ability of users to access the descriptions provided is clouded by the fact that many of them were sent as either links within the email responses or as attachments. Despite this, because the initial letter (and subsequent follow ups) asked for publicly available information, it is assumed that researchers could access this information if they really wanted to, even if they had to contact the institution and request the descriptions. However, while this is probably true, the fact that many archives do not make known the existence of such descriptions suggests that they do not attach high value to the information contained in their own documentation.

A follow-up survey was conducted in the spring of 2007, to allow the archives and archivists contacted the chance to amend or add to their original responses. By and large there was very little change in replies received from the various institutions.[4] A few

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[4]The Northwest Territories Archives did report one new accession (Dept. of Education, Culture and Employment fonds) containing minimal records created by the NWT Archives. Personal Correspondence

reported new and/or improved searchable databases on their websites,[5] while others merely commented that up-to-date descriptions were available on their websites.[6] The only significant change in the responses came from the Provincial Archives of New Brunswick. Its reply will be discussed later in the chapter.

Finally in 2008, all thirty of the original archives surveyed were contacted once more. In addition to requesting publicly available descriptions, each institution was also asked two other questions. First, the survey requested copies of any records used to document the appraisal process. Second, the archives contacted were asked to share the file classification systems used to manage and schedule their own records.[7] The 2008 survey actually had a better response rate than the 2003 survey, with roughly two thirds of the archives contacted replying. The increase in response rates can be attributed to the rising concern among archivists about documenting their work. This rising awareness is likely connected to the increased attention given to the topic in the professional literature, as outlined in the previous chapter.

I. LIBRARY and ARCHIVES CANADA

Extensive records documenting its functions are created and maintained by Library and Archives Canada (LAC), formerly the National Archives of Canada (NAC). The National Archives of Canada fonds (Record Group 37) consists of twenty-three series, including: various committee records, central registry files, acquisition records,

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with Karen Ashbury, January 22, 2007. The records created by the NWT Archives in this accession appear primarily to be comments made by the Archives relating to the Records Management and Deputy Ministers Committee. The Public Archives and Records Office of Prince Edward Island and the Hudson Bay Company Archives at the Archives of Manitoba (HBCA) both responded that descriptions of the records of their institution were still not in their respective databases. Kathleen Epp from the HBCA did add that the descriptions for those records are in process but have not been revised and approved as yet.

[5] Elgin County Archives and Library and Archives Canada.

[6] These include the British Columbia Archives and the City of Vancouver Archives. Neither of the up- to-date descriptions for these institutions added anything substantial to the response received in 2003.

[7] See Appendix B.

exhibition files, as well as records created and/or maintained by the Office of the Dominion Archivist and the Assistant Dominion Archivist. It contains approximately 94 metres of textual records and other media. In addition, lower level descriptions, both for series and file level, as well as accession records, are available online. Finally, of all the institutions contacted, LAC holds the most number of fonds related to its staff members, including the archival fonds for the following former National (Dominion) Archivists: Douglas Brymner, Arthur G. Doughty, Gustave Lanctôt, W.K. Lamb and Wilfred I. Smith.[8] Each of these fonds also possess in-depth descriptions.[9]

The extent of the holdings held by LAC relating to its own operations is significant, if not entirely surprising. The age and resources of LAC are considerably greater than most other archival institutions in Canada, however those details should not detract from the fact that it has documented its functions and activities for over one hundred years.

Private sector records at LAC are governed by a series of policies, procedures, directives and guidelines that begin with the Library and Archives of Canada Act (2004). Jim Burant, Chief, Art and Photo Archives states that the Canadian Archives and Special Collections Branch (CASCB) also have a Collection Development Framework, an Acquisition Orientation for Private Sector Records, as well as more specific guidelines for various areas, such as the *Acquisition Strategy: Photography Acquisition and Research* document used by the Art and Photography Archives sector of CASCB.[10]

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[8]Personal correspondence. Ghislain Malette to Christy Henry, January 24, 2007.
[9]National Archives of Canada fonds description is available at:
http://mikan3.archives.ca/pam/public_mikan/index.php?fuseaction=genitem.displayItem&lang=eng&rec_n br=266&rec_nbr_list=266.19069.20094.17413.24016.17149.17663.18975.18214.17790 (Accessed: June 28, 2007).
[10] Personal correspondence. Jim Burant to Christy Henry, September 10, 2008.

Additionally, "any private-sector acquisition potentially valued for tax credit at $75,000 or more, or which will be purchased for $25,000 or more, must be brought before a Major Acquisition Committee (MAC) of the department for consideration and approval."[11] The potential acquisitions are presented to the MAC through Major Acquisition Proposal documents. The Major Acquisition Proposals Burant provided consist of nine sections: description of material; significance; method of acquisition; cost; access conditions; preservation concerns; other relevant information; suggested price; and next steps. Although the Major Acquisition Proposal document does not have specific fields for rationale, it seems that arguments regarding the value of the collection in question can be made in the "Significance" section while recommendations are suggested in the "Next Steps" field. The document in and of itself is also a recommendation to the MAC that the collection of records is worth acquiring. Burant did not include any records created by a MAC; it would be interesting to see how that body documented its decisions in relation to the Major Acquisition Proposals.

Burant also included a copy of LAC's *Guidelines on Appraisal* (January 2007) with his response. This document is for use by both CASCB and Government Records and covers a range of topics, including: general considerations; content analysis; technical analysis; resource implications; and other factors such as legal considerations, rarity and organization. It also discusses archival assessment, stating that acquisition decisions at LAC must be based on the following factors:

> national significance, condition, content, technical analysis, other holdings
> in the same and in other [media] and in the same and other institutions,
> legal implications, and resource implications. Ultimately, the question is
> whether or not an item or a collection is historically valuable for an

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[11] Ibid.

evidential, informational, legal, or intrinsic point of view, both for today and in the future.[12]

The need for documentation of archival decisions and actions is stressed in particular in "Appendix I: Guidelines for the Appraisal of Government Media Records," which states: "recommendations for the acquisition of records must always be justified; never assume that anyone automatically knows why records should be acquired by the LAC. All recommendations for acquisition must be adequately argued and documented."[13]

Appraisal for private sector records appears to be heavily tied to acquisition at CASCB.[14] However the acquisition documentation, both the proposals and area specific guidelines[15] provided by Burant, combined with the *Guidelines on Appraisal* seem to provide both rationale and documentation for private sector records.

II. UNIVERSITY ARCHIVES

Seven Canadian university archives responded to the survey in 2008, although one of them, Concordia University Archives, declined to participate due to staff shortages and overextension in other areas.[16] The other six responses amount to a significant increase over the two responses (University of Ottawa Archives and University of Saskatchewan Archives) received in 2003.

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[12]Library and Archives Canada, *Guidelines on Appraisal* (January 2007): 24. Sent with personal correspondence. Jim Burant to Christy Henry, September 10, 2008.
[13]Ibid.: 26-27.
[14]Burant also provided a National Archives Advisory Board report of a monetary appraisal for private sector records. Monetary appraisal is beyond the scope of this thesis however its documentation is important.
[15] The *Acquisition Strategy: Photography Acquisition and Research* document provided by Burant for his section read a lot like a single institution documentation strategy. In it Art and Photography Archives outline six themes for art and photography acquisition as well as approaches for acquisition. Written in 2005, the document should provide a background and explanation for art and photography acquisitions at CASCB in the future.
[16]Personal correspondence. Nancy Marrelli to Christy Henry, September 30, 2008.

Mount Allison University Archives has no finding aid to any archival material of the Archives. They also do not have a file plan or records retention and disposition schedule for the Archives' own records, in large part due to the fact that there is no records management program on campus. The University Archivist, Rhianna Edwards, also noted that there needs to be better documentation of the Archives' appraisal decisions. All three items are high on her priority list, but as the sole employee in the Archives, Edwards rarely gets to dedicate any time to improving the situation.[17]

Dalhousie University Archives "has not in the past or up to this point in time created any of the documentation [asked for in the survey]." In regard to appraisal, no past or current staff members have documented their appraisal decisions. University Archivist Michael Moosberger cited staff shortages and a long list of projects and priorities as the main reasons why the Archives has not had the time to carefully document all of its appraisal decisions. He believes that his experience as an archivist (almost 25 years) is adequate when it comes to appraisal decision making.[18]

Theresa Rowat, Director and University Archivist at McGill University, reported that "many of the areas about which the survey sought information are indeed areas where we believe we need to make improvements. We have little in forms for the processes that you have identified . . . Our own, and our organizations/sponsor holdings are not particularly well described, nor even adequately appraised and processed."[19] In her email she also noted that the topic of archival documentation of archival practice is one that warrants significant attention by archivists.

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[17]Personal correspondence. Rhianna Edwards to Christy Henry, September 8, 2008.
[18]Personal correspondence. Michael Moosberger to Christy Henry, September 10, 2008.
[19]Personal correspondence. Theresa Rowat to Christy Henry, September 19, 2008.

The fonds for the University of Ottawa's own archival records holds a variety of media types; it includes textual records, graphic records, sound records and multiple media records. However, the scope and content note is brief. The University Archives describes its own fonds as containing "office files which document the functions of the Archives of the University, 1 sound tape of an interview. Includes annual and biennial reports (1967-1994) and accession files for the fonds and collections under the archivist ['s] care."[20] The description also indicates that records lists are available. The University of Ottawa had nothing to add to its 2003 response in subsequent follow ups, suggesting that regular accruals to the fonds, or at least the description of the accruals, are not a high priority.

Of all the university archives that responded, Queen's University Archives was able to provide the most comprehensive answer to the questions asked. The description of the Queen's University Archives fonds that is available online consists of three accessions totaling 6 m of textual records and 245 photographs. Interestingly enough, there are no dates included in the description of the fonds. The fonds contains "correspondence; photocopy request forms; registration forms; annual reports and original copies of inventories; daily journals; records of sales," as well as photographs of the opening of the renovated Queen's University Archives, various Annual Queen's University Archives Lectures, Archives staff, and visitors to the Archives. There are also sound recordings of the Annual Archives Lectures, with some research and scripts for the

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[20]Personal correspondence. Anne Lauzon to Christy Henry, March 25, 2003.

same.[21] According to the University Records Manager, Gillian Barlow, this is only a very partial description of what actually exists.[22]

Archives operations are covered by the OP2300s[23] in the University's records management Functional Hierarchy. Categories of archival records included in the file classification system are: planning and review; acquisition of archival material; collections maintenance; public services; and outreach.[24] Archival operational records scheduled for retention by Queen's University Archives include: acquisition case files; accession files; appraisal files; archival description development files; holdings maintenance files; archival holdings database; special events case files; archives orientation case files; promotional publication case files; and web-site development case files. As per the records schedule, Queen's University Archives destroys all records related to documenting their research services.[25]

As far as appraisal is concerned, Barlow reported that she does not use any forms for the appraisal of university records. Rather, after performing what appears to be a kind of functional analysis for each department and unit, including research, cursory inventories of the types of records kept and an analysis of the content of files, she meets

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[21] The Queen's University Archives fonds description is available at: http://db.archives.queensu.ca/dbtw-wpd/exec/dbtwpub.dll?AC=GET_RECORD&XC=/dbtw-wpd/exec/dbtwpub.dll&BU=http%3A%2F%2Fdb.archives.queensu.ca%2Fdbtw-wpd%2Ffondsdb%2Fquery-fonds.html&TN=fonds&SN=AUTO12867&SE=1911&RN=0&MR=20&TR=0&TX=1000&ES=0&CS=2&XP=&RF=Fonds+Results&EF=&DF=HTML+-+Fonds+Display&RL=1&EL=1&DL=1&NP=3&ID=&MF=&MQ=&TI=0&DT=&ST=0&IR=8653&NR=0&NB=0&SV=0&BG=ffffff&FG=000080&QS=query&OEX=ISO-8859-1&OEH=ISO-8859-1 (Accessed: October 22, 2008).
[22] Personal correspondence. Gillian Barlow to Christy Henry, September 19, 2008.
[23] OP2300 is the code used for the Queen's University Archives' operational records in their file classification system. The "OP" refers to the Operational Records Group, the "2000" refers to the Support Services function, and the "300" refers to the archives, which falls under Support Services.
[24] Queen's University Archives, *Directory of Records (DOR)*, June 2008 available at: http://archives.queensu.ca/rm/DirectoryUnivRecords/DoR.pdf (Accessed: October 22, 2008).
[25] Records Retention Schedules: Archives Services Schedules available at: http://archives.queensu.ca/rm/Retention/op2300.pdf (Accessed: October 22, 2008).

with the University Records Archivist (sometimes more than once) to discuss which record types should be archival. Barlow then creates records retention schedules, which are submitted to a University Records Committee for approval. Therefore, "the appraisal process for university records[26] (including the records created by the archives) is achieved by consensus, a collegiate decision" at Queen's University.[27]

Crista L. Bradley, Programming and Information Management Archivist for Archives & Special Collections, Dr. John Archer Library, responded to the survey for the University of Regina. She provided five finding aids that contain substantive descriptions of the administrative and operational records of the Archives. They were written between 1987 and 2001 and describe a total extent of approximately 3 metres of textual material dating from 1960-2000. The accessions contain a variety of materials related to archival operations and processes including acquisition, arrangement and description, policies and procedures, reference, public relations, grant applications and special projects, reports and statistical summaries, personnel files, and committees related to the Archives.[28]

The fact that each accession consists of a different combination of materials is likely due to the process by which the records are transferred to the Archives. According to Bradley, the Archives' records are currently managed outside a formal system,[29] which is the case for many University of Regina campus units. Files are created without reference to a formal classification system and once the file cabinets are full someone

[26]No information on how Queen's University Archives documents the appraisal of its private record collections was received from those working on that side of the Queen's archival program.
[27]Barlow to Henry, September 19, 2008.
[28]Shelley Sweeney, Mark Vajcner, and Erica Conly, *The University of Regina Archives fonds* finding aids (87-73, 95-5,98-25, 2000-6, and 2001-47).
[29]Bradley reported that there was an early effort to implement a common filing system across the University of Regina campus however she has seen little evidence of its current-day use in campus units or in the Archives.

boxes up the files that are deemed inactive and then formally transfers all of the files to the archival collection. The identification of inactive files is based on a subjective decision made by whoever is doing the boxing.[30]

Documentation of appraisal decisions is also irregular at the University of Regina. There are no specific appraisal forms, although notes about appraisal decisions may be filed in the university unit/private donor files (if they were noted at all). The same files might also contain correspondence with donors that accompanied the return of unwanted materials, shedding some light on what records were deemed un-archival. Bradley states that these files are not generally accessible to the public, although they are subject to inquiries under the Local Authority Freedom of Information and Protection of Privacy Act. Finally, she notes that in the past year the Archives has created a "declined acquisitions" file, which they hope will improve the transparency of some of their acquisition decisions.[31]

III. MUNICIPAL ARCHIVES

Seven municipal archives responded to the survey in 2008, including three that had previously provided information in 2003 (Calgary's Corporate Records, Archives, Elgin County Archives and the City of Vancouver Archives). Overall, the municipal archives contacted in the survey appear to do a better job of documenting archival operations and processes than the university archives.

The City of Toronto Archives was able to provide information for all three aspects of the survey. Its finding aid for administrative and operational records created by the City of Toronto Archives is a file list for records dating from 1960 to the late

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[30]Personal correspondence. Crista Bradley to Christy Henry, October 7, 2008.
[31]Ibid.

1980s. Because the finding aid is a file list it is difficult to determine the extent of the records (however, the file list is 40 pages long). The files cover subjects such as: correspondence; enquiries; photography; memos; researchers log book; visitors register; daily request logs; photo reproduction policy; photo reproduction requests (approved and denied); records relating to the metro Toronto records and archives study conducted in 1975-1976; personnel; public relations; staff manuals; archival associations; budget information; grants; donations; special projects and events; research files; conservation; reports and statistics; emergency planning; records of the City Archivist and Director of Records; and committee and conference materials.[32] Despite the existence of the finding aid, the series has not yet been converted to the City of Toronto's online database.[33]

Michele Dale, Supervisor, Collection Management and Standards for the City of Toronto Archives, also supplied the Records Classification Codes currently used by the Archives for its administrative and operational records. At present, the only records scheduled for permanent storage are those related to Archives Collections Management, Archival Collection Assessment Initiatives and Records Conservation and Preservation. While the second and third categories are fairly self-explanatory, the first category deserves a closer examination as it covers most archival functions. Archives Collection Management includes acquisition (both private donation and government records), appraisal, arrangement and description, and access. It may include the following documents: "copies of legal agreements and deeds of gift, monetary appraisal reports, archival appraisal reports, cultural property export review board applications, transfer sheets, finding aids, copies of accession records, and all supporting correspondence.

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[32]*City of Toronto* finding aid.
[33]Personal correspondence. Michele Dale to Christy Henry, September 11, 2008.

Records exist in both paper and electronic form."[34]   These three codes account for virtually all archival functions and it is interesting to note that all of them are being retained permanently.

In addition, there are also a number of categories that while scheduled for destruction are subject to archival review, such as Records Disaster Contingency Planning and Recovery, that may also include records that document archival operations and processes. Although not scheduled for permanent retention, it will be possible for the Archives to review its decisions if necessary. The Records Classification Codes also include one category – Exhibits – whose disposition is still to be determined. Many of the documents in this category, such as photographs of exhibits, brochures, press releases and so on, could be considered archives of archives as they document archival outreach. So the final disposition decision will be worth noting.

In response to the request for information on appraisal documentation practices, Dale shared the template for the City of Toronto Archives appraisal report. The appraisal report consists of a number of RAD elements such as the title, physical description, dates of creation, administrative history/biographical sketch, custodial history and the scope and content for the records being considered. It also records the circumstances that led to the preparation of the report and the findings of the appraisal. The findings of the appraisal are based on a number of considerations, such the evidential and information value of the materials, the relationship of the records to the Archives' Acquisition Policy, whether the Archives holds any related records or if associated records exist at any other archives, restrictions on use and access, the physical condition of the records, the

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[34]City Clerk's Office, City of Toronto Archives, "Archives Collections Management (I4110)" in *Records Classification Codes in Use by the Archives – 2008*: 8.

existence of any creator-generated finding aids, the possibility of future accruals, and any cost considerations for processing. There is also an optional section for other issues that might influence the appraiser's decision, such as a requested monetary appraisal by the donor. Finally, the archivist recommends whether the records should be acquired or not, and any related activities be done, such as sampling, if appropriate. The report is then signed and dated by the appraising archivist, two peer reviewers and a supervisor before being approved by both the City Archivist and the Director, Records and Information Management.[35]

Along with the appraisal report template Dale also sent the City of Toronto Archives criteria for appraising records. This document lists all of the various criteria that could be considered when conducting an appraisal, and is intended for use with both government and non-government records. Criteria are grouped under broad headings that include: conformity to institutional acquisition policy; most appropriate repository; evidential and informational characteristics; physical characteristics; contractual and legal obligations; institutional resources; and electronic records.[36] The document is quite comprehensive in scope, valuable not only as a guideline for archivists performing appraisals for the City of Toronto Archives, but also as a record documenting how the Archives conducts the appraisal function. Combined with the relevant appraisal report, the *Criteria for Appraising Records* should provide sufficient accountability and transparency.

The records of the City of Winnipeg Archives are divided into three categories, City Archivist's files, Records Centre Administration records and Records Committee

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[35]City Clerk's Office, City of Toronto Archives, *Appraisal Report template.*
[36]City of Toronto Archives, *Criteria for Appraising Records.*

files. They are scheduled under By-law No. 166/2003. City Archivist's files include records related to the administration of the Archives and the corporate records management program. This category covers a variety of records; the most relevant for the purposes of the archives of archives are finding aids, appraisal reports, preservation notes and acquisition records. All of the records in the City Archivist's files are designated archival. Records Centre Administration records, which include reference inquiries are destroyed after two years, while Records Committee files, which include records from meetings, including related reports and correspondence, are also scheduled for permanent retention. Through the Records Management By-Law, the City of Winnipeg Archives' own records are scheduled in such a way that at least some of their actions and decisions would be made transparent.[37]

The City of Vancouver responded to the first survey sent in 2003, providing the publicly available descriptions of their own records. The City of Vancouver Archives fonds consists of series "relating to access and reference, acquisition, preservation, records management and records storage, as well as liaison with other cultural institutions."[38] From this description it is clear that the City of Vancouver Archives has created and maintained records that document a substantial portion of their archival work. Although there is no scope and content information in the description, the administrative history for the City of Vancouver Archives fonds does provide some information on when each of the activities, listed in the quote above, were initiated at the repository. Even though the description is brief, it does state that more information, including series

[37]The City of Winnipeg, *Records Management By-Law No. 16-2003*, available at: http://www.winnipeg.ca/CLKDMIS/DocExt/ViewDoc.asp?DocumentTypeId=1&DocId=148&DocType=O (Accessed: October 26, 2008).
[38]City of Vancouver Archives fonds description is available at: http://www.city.vancouver.bc.ca/ctyclerk/archives/webpubhtml/w_archiv.htm (Accessed: June 29, 2007).

descriptions and file lists, can be found in the fonds inventory located in the Reading Room of the City of Vancouver Archives. It is also interesting to note that in addition to a searchable database on its website, the City of Vancouver Archives also provides departmental summaries, including one for the Archives, which links to each department's fonds level description. This made locating the City of Vancouver Archives fonds considerably easier than similar descriptions for some of the other archives surveyed because the exact name of the City of Vancouver Archives fonds was not needed to find the description.[39] The significance of this format is that users need not be aware of the existence of the fonds, or the type of records it contains, in order to find the description.

The online description for this fonds is minimal, although the description states that additional information is available. The existence of this additional information implies that some effort has gone into preparing the fonds; however, without access to more information about the series level records it is difficult to determine the extent of the records of the City of Vancouver Archives fonds or how well the described records document the work of the City of Vancouver Archives.

Only two comments need to be made about the description of the fonds. Firstly, the description does not include references to the Major Matthews Collection. Major Matthews was the first Archivist of the City of Vancouver and the founder of the City Archives. Therefore, it is possible that his collection might contain information about the administration and activities of the Archives. Secondly, although the records in the city

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[39]The titling of the fonds containing records that could be perceived as archives of archives was repeatedly problematic when using the online searchable databases of the institutions surveyed. In particular, keyword searches using the name of the archives in question tended to include hits for any description that contained the archives' name. In some instances this led to hundreds of descriptions that needed to be sifted through in order to find the actual fonds of the archives own records.

Archives fonds date back to 1929, the majority of the records date from 1970-1990. This suggests that the archives of this archives has only become a concern in the recent past. This is not a criticism per se, as a number of the archives discussed in this chapter can only date their own documents back to the same time period; however, it seems a relevant point.

Heather Gordon, Archives Manager, responded to the file classification system and appraisal portions of the 2008 survey. The City of Vancouver Archives uses the city's function-based file classification system.[40] The three primaries that apply to the Archives records are: Archives – Research and Access; Archives – Holdings Administration; and Archives – Conservation and Preservation. Records in the first primary relate to providing access to the archives, including description, access, outreach and public programming. From this primary, public programmes and outreach case files, descriptions and finding aids, restricted records index and research room log books are designated as archival records. Holdings Administration records relate to the acquisition and subsequent processing of archival material, both government and non-government. Records scheduled for permanent retention in this primary include acquisition project records, accession control records, donor records, archival holdings case files, holdings development project records and deaccession records. Designated archival records in the Conservation and Preservation primary include conservation treatment records, conservation project records and scanning metadata sheets.[41] At the moment, all of the

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[40]According to Gordon the city's system looks a great deal like the British Columbia Government's Administrative Records Classification System (ARCS) and Operational Records Classification System (ORCS), which are used at the British Columbia Archives.
[41]*VanRIMS 04-8400 Information Management: Archives* sent with personal correspondence. Heather Gordon to Christy Henry, September 10, 2008.

classifications are still in draft form, waiting for approval by the City's Corporate Records Committee.[42]

Overall records documenting the majority of archival functions at the City of Vancouver Archives appear to be scheduled for permanent retention under the three primaries outlined above. However, there is one large omission: appraisal documentation. Gordon responded that the Archives does not have any records documenting its appraisal process. All it has done in the past is document the extent of the material coming in and the extent left post-appraisal.[43] She did not indicate where those notes are kept or for how long.

The City of Victoria Archives does have a series description for its operational files. Covering the dates 1967-1995, the series consists of 0.66 metres of textual records, including correspondence, memoranda and reports. It is probable that the correspondence files document archival work to some degree, mostly likely reference services or perhaps acquisition. There are almost no files dedicated strictly to archival functions. The possible exceptions are a couple of conservation reports, an inventory of non-visual archives material, and two files dealing with records management. Other files may include documentation but it is impossible to determine that possibility based on the current series description.[44]

Trevor Livelton, Archivist at the City of Victoria Archives, reported that all of the Archives Operational files are managed by a single schedule. According to the schedule he provided, the Archives generates records that document acquisitions/accessions

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[42]Gordon to Henry, September 10, 2008.
[43]Ibid.
[44]City of Victoria Archives, *316 Operational Files* sent with personal correspondence. Trevor Livelton to Christy Henry, September 16, 2008.

(including deaccessioning), arrangement and description, appraisal (only for Cultural Properties Import and Export Act and NAAB Appraisal In-House), conservation, and access.[45] The schedule does not provide any details as to the records included in each primary so it is difficult to tell how comprehensive or effective they are at adequately documenting archival decisions and actions. Nevertheless, the existence of multiple primaries that cover a variety of archival functions is promising. The situation is further complicated by the fact that all of the Archives records are designated selective retention.[46] As a result of the vague schedule and the very basic series description, it is impossible to tell from these documents exactly what records the City of Victoria Archives is creating and keeping to document its work.

Established in 2002, the Elgin County Archives was unique among the archives contacted. As a new institution, it did not possess any archived records documenting its own functions and activities. Therefore in 2003, Elgin County's Archivist, Brian Masschaele provided a few of his institution's policies, including the founding by-law and acquisition policy, as well as personal comments regarding accountability and archives. While the by-law establishing the Elgin County Archives mentions promoting accountability, little is said about the Archives' own accountability issues, except for stating that the Archives will "abide by pertinent legislation with regards to access and privacy, specifically the Municipal Freedom of Information and Protection of Privacy Act."[47] The acquisition policy on the other hand mentions a specific form, the deed of

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[45]*CVARD*, primaries 1321 to 1327 sent with personal correspondence. Livelton to Henry, September 16, 2008.
[46]Livelton to Henry, September 16, 2008.
[47]County of Elgin By-Law No. 01-*21, Being a By-law to Establish the Mandate and Activities of the Elgin County Archives*, Section 4.d.

gift, for private donations[48] that would certainly be considered for inclusion in the archives of an archives. However, there is no mention of what happens to the deeds of gift after their initial creation.

Perhaps more interesting in this instance are Masschaele's comments regarding accountability. For him, a "major thrust behind the need to increase accountability is the implementation of access to information and privacy laws. Institutions are now much more liable for how they manage and release both public and private records, leading to the need to have clear policies in place and the need to explain these policies to the public and stakeholders. There is simply too much legislation in place these days to be sloppy in the way we document our actions!"[49] In accordance with his personal views, Masschaele took the step to have all of his institution's forms reviewed by a solicitor in the event that the Elgin County Archives should ever be called to account for its actions.[50]

The 2008 survey was responded to by Stephen Francom, the new Elgin County Archivist. According to Francom, the Elgin County Archives "does not formally document its appraisal decisions per se, but [it] routinely documents the immediate result of such decisions in citing specific records retained or returned to donors or records discarded with a donor's permission following an acquisition."[51] Generally the decisions are documented in one or more classes of documents including: the deed of gift, the accession record, and the records transfer inventory. Based on the samples Francom sent with his response, Elgin County Archives has documented appraisal decisions in two

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[48]Transfer agreements for municipal records are mentioned in the County of Elgin By-Law No. 01-21, however the form, content or disposal of the agreements is unknown.
[49]Personal correspondence. Brian Masschaele to Christy Henry, August 17, 2003.
[50]Ibid.
[51]Personal correspondence. Stephen Francom to Christy Henry, September 11, 2008. (emphasis original).

fields on the accession form: administrative notes and physical description. The administrative notes field is used to list materials returned to the donor or discarded. The physical description field notes both the extent of the records when they were donated and the extent following any appraisal decisions. The records transfer inventory, which is generally used for large donations, notes the keep, return and destroy decisions at the item level. Although these documents do not record the rationale behind appraisal decisions, Francom "think[s] the connection between a 'retained', 'returned' or 'discarded' citation and our acquisition policy is clear and transparent."[52]

Acquisitions by Elgin County Archives must meet a number of criteria in order to be accepted. These include: being unique in nature; pertaining directly to the County of Elgin or its citizens; title to the records must be clear; donor must be willing to enter into an agreement with the Archives; research value; the evidence in the records is not already documented elsewhere; and provenance and context for the records is sufficient. Additional considerations include size, access restrictions, physical conditions, possibility of financial subsidies for preservation and management of the collection, potential revenue generation, and what will happen to the records if they are not acquired.[53]

Overall the *Elgin County Archives - Acquisition Policy* is clear and conforms to the best standards outlined in many archival manuals; but it is uncertain if the policy and the current appraisal notes at the Archives are always sufficient for documenting appraisal decisions. Both of the accession records Francom supplied include appraisal notes. In the accession containing records that were microfilmed, the subsequent decision to cull the original hardcopies is easily understood from the appraisal note:

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[52]Ibid.
[53]*Elgin County Archives – Acquisition Policy* sent with correspondence. Masschaele to Henry, August 17, 2003.

Elgin County Archives chose to discard the hardcopies because the information in them was preserved on microfilm. The originals were no longer archival. However, although the second accession provided by Francom states that certain records were returned to the Municipality that had made the donation, the reasons for returning the selected records is not evident. It is difficult to determine which criteria in the *Acquisition Policy* that the records failed to meet. A more direct reference to what criteria of the *Acquisition Policy* the returned records failed to meet would make the appraisal decision much more transparent.

With regard to the preservation of documents that relate to acquisition and appraisal, Elgin County Archives arranges all deeds of gift with other documents, such as donor correspondence, as part of the larger accession record relating to each acquisition. Classified as permanent records, these documents are processed into the collection as part of the Elgin County Archives fonds.[54]

Founded in 1986 in affiliation with the Saskatchewan Archives Board (SAB), the City of Regina Archives (CORA) did not become an independent institution until 2002. As a result, records documenting the activities of CORA prior to 2002 are spotty.[55] Dana Turgeon, City of Regina Archival Assistant, believes that many of the records may still be at SAB. Employees at CORA prior to 2002 were actually SAB employees, therefore any records they created would belong to SAB.[56] Furthermore, although SAB did transfer to CORA the accession records for its collections, Turgeon reports that "they are

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[54]Francom to Henry, September 11, 2008.

[55]According to the list of archival records sent by Turgeon from Regina's records management system it appears that CORA has a number of photographs of archival exhibits, displays and personnel, as well as legacy files for requests for disposals and records management issues. There is also a number of accession record listings for the "City of Regina Archives series."

[56]Copies of the records sent from the City of Regina to SAB for this period are contained within the City Clerk's collection at CORA so it is possible that certain archival actions and decisions may be documented there.

frustratingly vague on appraisal methods. This has caused no end of trouble to us in the past . . . and has led to us having to reappraise records and deaccession certain items because of limited space and a mismatch with our mandate."[57]

A new retention schedule, not yet approved by City Council, goes some way to rectifying the lack of archives of archives at CORA. Under this schedule records pertaining to disposals, accessions, appraisals, conservation assessments and deaccessions are to be kept permanently.[58] To improve the quality of the records created by CORA to document its decisions and actions, Turgeon has created a written accession policy, an appraisal procedure, and a deaccession policy. Although these documents are helpful in providing guidelines for acquiring records and performing certain tasks, they do not really provide a means of recording the rationale behind decisions taken. Even in the appraisal report Turgeon sent, the conclusions are listed but the explanations behind them are less clear. Like the County of Elgin Archives, CORA needs to make the connection between its decisions and its existing documentation more evident. However, it is interesting to note that in her correspondence Turgeon revealed that "I'm not super thrilled with my appraisal policy, to tell you the truth. Appraisal is as much an art as a science, and I found it very hard to sit down and explain the process on paper when I wrote it."[59] Archivists' discomfort with performing the appraisal function has been well documented in the literature and perhaps goes some way to explaining why archivists have not developed consistent and effective means of documenting the appraisal function. However, if archivists are to be transparent and accountable in their work they need to overcome their unease and explain how they perform appraisal.

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[57]Personal correspondence. Dana Turgeon to Christy Henry, October 24, 2008.
[58]Personal correspondence. Karen Sax to Christy Henry, October 27, 2008.
[59]Turgeon to Henry, October 24, 2008.

The 2003 survey revealed that the City of Calgary's Corporate Records, Archives appears to have very thorough documentation practices. The *Policies and Procedures Manual* requires detailed information on every aspect of archival work: acquisition, accessioning, appraisal, arrangement and description, access, reference service, outreach and preservation. It also outlines the processes by which the archivists at that institution perform their duties. In particular, the *Manual* makes reference to a multitude of forms that the Archives uses in its daily work, for example the Corporate Records Classification and Retention Schedule, donor agreements, an Accession Register and an Appraisal Register. However, the appendix attached to the online version of the *Manual*, which consists of a list of sample forms, could not be accessed.[60]

A few comments on the wording of the *Manual* should be made. To begin with, it states that Corporate Records, Archives will not retain or acquire all of its records as full series.[61] There is no mention of the fact that archivists should be documenting what is not acquired or retained. Furthermore, while the *Manual* is available online, the policies presented in it (like those written by most archives) are probably more likely to be understood by in-house staff or other archivists who maintain similar practices, than the general public or casual user. Because of this, researchers may not be able to use, or may have difficulty utilizing this tool.

The *City of Calgary Archives Policies and Procedures Manual* also provides a good example of the conventional approach to archival work seen in the records of almost every archives surveyed. Under the general policy on arrangement and

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[60]Although Corporate Records, Archives was asked to provide samples of these forms, it did not provide copies. Therefore, it is impossible to assess the effectiveness of the forms as aids in documenting the functions and activities of Corporate Records, Archives.

[61]Corporate Records, Archives. *City of Calgary Archives Policies and Procedures Manual, January 2002*: 8-9.

description, it is stated that "the purpose of arranging and describing records is to elucidate the context and factors that lead to the records being created."[62] However, if records are understood to be continually evolving, and if it is acknowledged that archivists, through their work, are shaping the records, then archival work becomes part of the context that arrangement and description is supposed to elucidate. Moreover, the choices of the archivist also become part of the reasons that (continue to) create the record. In other words, a postmodernist approach, as discussed earlier, demands that the decisions archivists make, and the reasons behind those decisions, should be recorded because they are part of the process of the record's creation.

Follow-up contact with Corporate Records, Archives provided additional information on how it documents its work. According to Glennda Leslie, records that have been accessioned documenting the Archives' work have not been formally arranged and described. As a result there is no publicly available formal description. Leslie did state that the records themselves would be available via the accessioned information,[63] however the electronic accession register that the Archives uses is not publicly available.[64] Therefore, unless a researcher is aware that such documents should exist, there is no way to discover them. Further complicating the matter is the fact that any descriptions that do exist would not be searchable under the title "Corporate Records, Archives." Rather, a search would have to be conducted following the following organizational structure: City Clerk's Department, Administrative Services Division, Corporate Records Section.[65]

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[62]Ibid.: 19.
[63]Personal correspondence. Glennda Leslie to Christy Henry, January 23, 2007.
[64]Conversation between Glennda Leslie and Christy Henry, June 20, 2008.
[65]Leslie to Henry, January 23, 2007.

Administrative and operational records generated by Corporate Records, Archives are scheduled under Calgary's Corporate Governance and Information Management schedules respectively. Administrative records that document the development, implementation and administration of corporate programs (including Archives) are scheduled for selective archival retention.[66] The Information Management schedule lists two categories of operational records for the Archives: histories and outreach. The first category, which includes records related to government and non-government acquisition, accessioning and de-accessioning, finding aids and related materials are all scheduled for full archival retention. Outreach records are scheduled for selective archival retention.[67] There is no mention of appraisal documentation.

IV. PROVINCIAL AND TERRITORIAL ARCHIVES

All provincial and territorial archives were contacted in 2003 and then again in 2008. Unlike the university and municipal archives' responses, which increased with the second survey, fewer provincial and territorial archives responded in 2008. There were two new participants in this category, the Provincial Archives of Alberta and the Archives of Manitoba.

The most extensive documentation for a provincial or territorial archives of its own archival records came from the Archives of Ontario. The archival descriptions for the records of the Archives of Ontario are available online and encompass fifty-three distinct series.[68] Although the existence of series level descriptions for this institution is

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[66]*City of Calgary Corporate Records Classification and Retention: Classification and Retention Schedule – Corporate Government (02-01-05-CG)*, 2007 November: 29.
[67]*City of Calgary Corporate Records Classification and Retention: Classification and Retention Schedule – Information Management (02-01-05-IM)*, 2007 May: 1.
[68]The fifty-three series listed on the website are pretty comprehensive for RG 17, the Records of the Archives of Ontario, according to staff at the Archives of Ontario. See personal correspondence. Anastasia Rodgers to Christy Henry, April 2, 2003.

the result of the Archives of Ontario's series level arrangement and description program, the fact that descriptions for all of the processed records of its own work are available online suggests that the Archives of Ontario considers this an important issue. The Central Registry that the Archives of Ontario maintains further supports this proposition. This registry holds records of "all accessions, appraisal decisions (for both government and private acquisitions), donor/deeds of gift information (for private records), active records schedules, . . . [and] transfer sheets."[69] In addition, collection files for each government record series and for each private fonds are maintained in portfolios. These files may contain "copies of schedules, accession forms, etc."[70]

Appraisal at the Archives of Ontario is conducted through archives disposition forms for records schedules (government records) and assessment reports (private records). The Archives Disposition Form is created by an archivist for each records schedule that is appraised, "ensuring that the rationale for retention/destruction is thoroughly documented on the form and taking into account any relevant functional analyses which may have been prepared."[71] In cases where selective retention is recommended, ideally a preliminary Selection Proposal is prepared in conjunction with the Archives Disposition Form.[72] An Assessment Report is prepared for most potential donations of private records, although one does not have to be completed for records that can "be determined to fall outside the acquisition policy of the Archives of Ontario or clearly lack provincial significance."[73] Through the use of these forms, particularly the

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[69]Rodgers to Henry, April 2, 2003.
[70]Ibid.
[71]Personal correspondence. Joseph Solovitch to Christy Henry, September 16, 2008.
[72]Ibid.
[73]Ibid.

way in which both require recording the rationale behind appraisal decisions, the Archives of Ontario is documenting its impact on the appraisal function.

Correspondence with the Provincial Archives of New Brunswick (PANB) revealed that while that institution has a Provincial Archives records series, the description that accompanies the series is limited. The dates of creation indicate that the institution has records dating back to 1968, the year that the Archives opened its doors. The series also contains a surprising number of media types – textual records, slides, microfilm reels, prints and audiocassettes. The scope and content field of the description states that the

> series comprises of correspondence, inquiries from the public, call slips, inter-library loans, registration forms, draft inventories, files on the Flemming and Burchill manuscripts, activity reports, cultural sub-agreements and strategies, departmental goals and objectives, departmental strategy background papers, and strategic plan development.[74]

The audiocassettes are guest speeches that detail the "day to day operation of the archives and the administration of a retrieval service of records for use by the general public and government."[75] The material has been arranged consistent with administrative functions.

While this listing is helpful, a deeper description of the records would certainly be beneficial, since it is difficult to determine what this specific archives of the archives contains; in particular, the scope and content makes no mention of the various types of media, aside from the audiocassettes. Series level descriptions or file lists would certainly provide more detailed information, but at the very least, a list of administrative functions would be helpful, given that that is how PANB has arranged its records. The existence of descriptions for the records of an archives is immaterial, both for researchers

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[74]Personal correspondence. Denise Jones to Christy Henry, March 26, 2003.
[75]Ibid.

and for accountability issues, if the information provided in the description cannot be easily accessed or understood by those outside the institution or archival profession.[76]

The most interesting response from the 2007 follow-up survey came from Dale Cogswell at PANB, who felt that a more detailed response was required than the one received in 2003. According to Cogswell, PANB keeps various types of files concerning the acquisition of records of the Government of New Brunswick and private collections. These include accessions registers, which contain details such as what types of records were received, from whom, and their dates, for every record, collection, book, map or document received. There are also background files for the accessions, containing correspondence, notes, agreements and so on. Also, there are donor files, relating mostly to private sector collections, which contain personal information on donors, as well as correspondence regarding purchases, appraisals and tax receipts. General appraisal policies and criteria are used for selection appraisals; appraisal reports are only completed on specific items and are kept with the archival unit and the background information on the series involved.[77]

All of the records mentioned above are considered PANB operational records,[78] and therefore have not yet been incorporated into the finding aids of the archives. Nevertheless, Cogswell reports that much of the information in the files (except personal information) would be available to any researcher asking about the background of

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[76]At the time of its initial response, it was unclear if the Provincial Archives of New Brunswick created and maintained documents in the processes of appraisal, arrangement and description, preservation/conservation and public programming and reference. Such documents would provide more insight into the workings of the institution if they were included in the Provincial Archives Records finding aid.

[77]Personal correspondence. Dale Cogswell to Christy Henry, April 30, 2007.

[78]Similarly, the records created in an official capacity by New Brunswick's provincial archivists are also included in the Archives' operational records. These records are included in PANB's central filing system of the Archives' operation records.

particular records.[79] Although it is obvious that PANB has created and maintained a large body of records that could be classified as its archives, and is willing to make them available to the public, their status as still current or operational records raises an important issue. Specifically, how available are the records if researchers, and the public, are not made aware of their existence because they remain outside the descriptive system for archival (rather than operational) records as such?[80] If users of archives are unaware of the existence of such records, which is more likely if the records remain operational, it is unlikely that they will ask to view them. This situation is further complicated by the fact that because the majority of the general public does not understand what archivists do, people who may need to inquire into archival practices are unlikely to know how to locate the right documentation unless it is clearly identified.

According to John McLeod, an archivist in the government records section of Nova Scotia Archives and Records Management (NSARM), his institution has not "done a particularly great job at documenting what [they] do."[81] For example, the practice of selection and appraisal, beyond the single act of appraisal at the time of acquisition, did not occur at the Archives until the 1980s. Even for archival work for which they do have documentation, such as accessioning, McLeod feels that those documents, which date back to the 1930s, probably document what was acquired, rather than why it was acquired.[82] The NSARM fonds supports McLeod's observations; the fonds description is heavy on accession and reference records, with some public programming documentation

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[79]Cogswell to Henry, April 30, 2007.
[80]This can happen with archived records as well, but with archived records there is at least the probability that some kind of description will be available. Ultimately, it is the archivist's duty to make accessible to any researcher information about the existence of records, such as records in an archives of an archives, regardless of whether the researcher asks for those records specifically.
[81]Personal correspondence. John McLeod to Christy Henry, March 25, 2003.
[82]Ibid.

and records created by archives staff. The description is also dense with correspondence, due in part to "a very inept classification system that treated almost everything as correspondence."[83] This classification system in particular makes it difficult to determine the nature of the records in the fonds without viewing the actual records or consulting an archivist familiar with the material.[84] Nevertheless, the fonds level and series level descriptions of the fonds do a fairly good job of describing a situation like the one McLeod outlined. NSARM has not responded to any of the follow-up surveys, therefore there is no way to determine if the situation at that institution has changed over the last five years.

Description of its own records at the series and fonds level was not a high priority for the British Columbia Archives (formerly the Provincial Archives of British Columbia, PABC) at the time of the 2003 survey. It had only recently begun this process, and although it did have a draft form of a description for the PABC fonds, it was not yet available online. According to the Archives, as the descriptions were completed they would be made available electronically on the BC Archival Union List, and hard copies of the finding aids would be placed in the BC Archives reference room.[85]

By the time of the follow-up survey in 2008, the PABC fonds description was available online. The scope and content of the description indicates that the fonds consists of records created in the process of appraisal, arrangement and description, preservation and access. Records generated by archives staff, including the Provincial Archivist are

[83]Ibid.
[84]Ideally this fonds should be redescribed to provide a more worthwhile description; however, the funding and time to accession, arrange and describe new collections understandably takes precedence over the redescription of older ones.
[85]Personal correspondence. Katy Hughes to Christy Henry, April 2, 2003.

also included.[86] As it existed, the draft description gave little information about the scope of the institution's archives, however the completed description lists the extent as 24.04 metres of textual records and 2 microfilm reels that cover the dates 1899-[ca.1979]. Additional information on the majority of these records is available via catalogue cards and file lists in the reference room.[87] More recent records documenting the work of the BC Archives exist but have not crossed over from being corporate records to archival records.[88]

Appraisal methodology at the BC Archives is dependent on the type of records being appraised, whether government or private. The appraisal of all government records is performed by archivists who work for the Corporate Information Management Branch (CIMB) of the Ministry of Labour and Citizen's Services; CIMB and the BC Archives used to be one branch (BC Archives and Records Service) within the government but have since been reassigned to Labour and Citizen's Services for CIMB and the Royal British Columbia Museum for the Archives. CIMB uses the *Operational Records Classification System (ORCS)* and the *Administrative Records Classification System (ARCS)*, as well as special schedules to appraise records.

Therefore, once government archival records reach the end of their semi-active stage they are to be transferred to the BC Archives with the appraisal and selection work already completed. Government records received by the BC Archives prior to the separation of the Archives from CIMB are appraised at the BC Archives using a form

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[86]Provincial Archives of British Columbia fonds description is available at:
http://search.bcarchives.gov.bc.ca/sn-
4064769/view/Fonds/find%2Bprovincial%20archives%2B%2B%2B%2B/1 (Accessed: November 3, 2008).
[87]Ibid.
[88]Personal correspondence. Katy Hughes to Christy Henry, September 10, 2008.

provided by CIMB. Once completed the form is submitted to CIMB for approval. Appraisal of private records is handled directly by the BC Archives using an acquisition approval form, which is submitted to the Royal British Columbia Museum Collection Committee for approval. Notes on any selecting done are kept in the accession file, but there are no current forms in use.[89]

The *ORCS* that classifies and schedules the records of the BC Archives is entitled "Archives and Records." This *ORCS* amends the *British Columbia Archives and Records Service ORCS* (1994 Edition) and through the use of schedules deals with the retention and disposition of the operational records created or received by BC Archives under the Document Disposal Act (RSBC 1996, c. 99) and the General Management Operating Policy (GMOP). The records "document the administration and control of archival and records management programs, control of government and non-government records, preservation and conservation of BC Archives holdings, and public programs developed and delivered by the government archives."[90] The records controlled by the Archives and Records *ORCS* include all records created and received since July 20, 1871.[91]

Retention schedules list retention periods for active, semi-active and final disposition stages, as well as the reasoning behind the final disposition decision. The records in the *Archives and Records ORCS* are retained in their active stage until they are superseded or become obsolete. At that point, the majority of them are kept in semi-active storage for five years.[92] BC Archives records that are either selectively or fully

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[89]Ibid.
[90]*Operational Records Classification System (ORCS)* - Archives and Records, available at: http://www.lcs.gov.bc.ca/cimb/policy/ORCS/ARCH/default.htm (Accessed: December 19, 2007).
[91]Ibid.
[92]Section 16 of the *Archives and Records ORCS* deals with records retained in the active and semi-active stages for more than seven years. The reasons listed for the additional retention period are operational or reference purposes, or to comply with financial or legislative requirements.

retained fall under the following headings: policy and procedures; corporate policy; archival and library holdings; documentation of archival and library holdings; preservation and conservation of archival holdings; archives and records information system (ARIS); government client records; community archival programs; government records documentation; intellectual property issues; general documentation; other significant projects and initiatives; and records storage facility documentation.[93] Many of the records that fall under the above headings, such as appraisal and selection project records, archival description documentation, exhibit files, disposition records of records transferred to the Archives, and accession registers, are records that document the functions and activities of the BC Archives.

The Provincial Archives of Alberta (PAA), by its own admission, does not "do an exceptional job on [their] own records."[94] The records of the PAA are included in the fonds level description for the Alberta Department of Culture and Multiculturalism. Until such time as the records are described at the series level it is impossible to judge how well the PAA has documented its decisions and activities.

Appraisal of private records at the PAA is conducted in the following way: an archivist writes a combined acquisition approval and archival appraisal report, which is then submitted to an acquisition committee comprised of all the Private Records and Reference Archivists. If the report is approved it goes to management for signature.[95] The 2008 example reports that Scott Goodine, then Team Lead, Private Records, provided contain information on the donation under consideration (including extent and dates), provenance, access conditions and use conditions. There is also a section that

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[93]*Archives and Records ORCS Executive Summary.*
[94]Personal correspondence. Scott Goodine to Christy Henry, September 30, 2008.
[95]Ibid.

contains the rationale for the appraisal decision, which includes a description of the materials selected for preservation or destruction. Accommodation is also made for explanation of scheduling decisions for any records within the collection under consideration.[96] The two examples provided do a good job of explaining not only what decisions were made regarding the collections, but also why those particular decisions were made. The reports, if made available to the public, should make the actions of the PAA both transparent and accountable.

The file classification system of the PAA is presently being redone as it is outdated. The current schedule exists only in paper form and is not publicly available. Goodine did not say when this process would be completed, but did state that the Provincial Archivist sits on the committee that approves all record schedules for the Alberta government.[97]

Like some other Canadian archives, the Northwest Territories Archives has not spent a great deal of time creating or maintaining records to document its own activities. At the time of initial contact in 2003, the NWT Archives possessed four accessions "that contain administrative and operational records generated by the NWT Archives itself."[98] All of the accessions are part of the Government of the Northwest Territories Department of Culture and Communications fonds. This government body was responsible for the archives program between 1985-1992. Of these four accessions, only one has a finding aid.[99] In the Government of the Northwest Territories Department of Culture and

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[96]Based on two *Provincial Archives of Alberta Combination Acquisition Approval and Archival Appraisal Forms* sent with personal correspondence. Goodine to Henry, September 30, 2008. Goodine allowed the structure of the forms to be critiqued, but asked that the data of the completed forms be withheld.
[97]Goodine to Henry, September 30, 2008.
[98]Personal correspondence. Karen Ashbury to Christy Henry, March 21, 2003.
[99]The accession with a finding aid is G-1993-007, and is available online at the NWT Archives web site.

Communications fonds, the NWT Archives is listed as Series IV and consists of only nineteen centimetres of textual material. According to the finding aid, the series files include "administrative and correspondence files primarily concerning archival acquisitions"[100] and date from 1965-1978.[101]

While the archives of the NWT Archives described in the finding aid is minimal to say the least, the finding aid does demonstrate an awareness of the importance of documenting archival decisions and activities. In the "Introduction" to the finding aid, Janice Brum states that "during the processing the material was reduced from the original 8 meters to 3.5 meters."[102] Although she does not divulge what was destroyed or why it was destroyed, her note that additional records did exist and that the NWT Archives removed them is unique among the descriptions received from Canadian archives. Its appearance in this particular finding aid is encouraging because it suggests that the Archives considers the work it does as part of the process through which the record is created. As such, it may feel that it is important to convey that process to users.

As part of the Department of Education, Culture and Employment, the administrative records of the NWT Archives are managed under the GNWT Administrative Records Classification System, 1995-32 (ARCS). The operational records of the NWT Archives are primarily created and managed in-house through their database, AIMS (NWT Archives Information Management System). AIMS is used for all archival activities, including donor management, appraisal, arrangement/description, and researcher and client services. Specifically, the acquisition form has a section for

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[100]Janice Brum, *Northwest Territories Department of Education, Culture and Employment Culture and Heritage Division* (NWT Archives finding aid, completed February 5, 1996): 19.
[101]More recent records are located in the accessions that have no finding aids: G-1999-092, G-1999-053 and G-1999-057). See personal correspondence. Karen Ashbury to Christy Henry, March 21, 2003.
[102]Ibid.: 3.

appraisal, and all appraisal decisions are recorded in AIMS. Karen Ashbury, Archivist for NWT Archives, did not specify if the documented appraisal decisions include their rationale. Without the rationale behind the decisions the recorded appraisal notes are less valuable in terms of accountability and transparency, however at least the NWT Archives is aware of the need for records documenting their actions and decisions.

The Archives of Manitoba (AM) were one of the new respondents to the 2008 survey and like the Archives of Ontario, they use series level descriptions. Searching "Archives of Manitoba" under the "Records Creator – Manitoba Government" section of their database returned a description for AM and a list of nine archival record series created by that entity. The series' consist of approximately 184 cu. ft. of textual records dating 1944-2003. They contained records related to: record and information management; preliminary inventories for every accession used in-house by Government Records Office (GRO); the administration of GRO; GRO accession registers; GRO administrative office files; Archivist of Manitoba files, which are primarily administrative in nature; submissions made by AM to various government ministers; and Preservation Services office files. The description for the accession registers notes that since 1985 Private Records at AM have kept their own similar registers.

At the time this thesis was written private records acquisitions at AM were evaluated by an Acquisition Committee. The Committee assesses appraisal reports, which are submitted for all potential acquisitions, and then makes appraisal recommendations to the Acting Archivist of Manitoba. The "Appraisal Report" form provided by Paula Warsaba included fields for the title, extent, dates, administrative/biographical and custodial history of the record, the scope and content,

existing records at AM, acquisition agreement, further accruals, related and associated records, geographical scope, uniqueness, preservation issues and resources required to process, preserve and provide access to the records.[103] The was no field specified for appraisal decisions or rationale on the appraisal report form, however, there was an accompanying "Acquisition Decision" form that is to be attached to the "Appraisal Report."

The "Acquisition Decision" form has three main components. The first is an area for the Acquisition Committee to record its recommendation for the records. The second area is where the Archivist of Manitoba records his/her decision to either acquire or not acquire the records, with room for optional comments. The final component of the form is a list of possible "action[s] taken" listing four possible actions, including: completing an Instrument of Gift form; informing the donor that the records would not be acquired; not transferring the records to AM for assessment; and transferring the records to AM for assessment and either returning them to the donor, discarding them or transferring them to a location to be specified. This area also has room for comments. The form is signed and dated by both the Archivist of Manitoba and the Archivist responsible for the form.[104] Although the "Appraisal Report" used by AM is fairly standard and traditional in nature, the "Acquisition Decision" form does provide the ability, if used properly, for archivists at AM to record the rationale behind the decisions they make regarding the appraisal of private records.

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[103] *Appraisal Report* form sent with personal correspondence. Paula Warsaba to Christy Henry, December 22, 2008.
[104] Archives of Manitoba, *Acquisition Decision* form.

Paula Warsaba also provided a link to the Government Recordkeeping section of the AM's website as she felt several of the procedure documents on that page "point to appraisal in a round about way."[105] The links on that page included procedures on how to prepare records schedules and how to transfer government records to the archives.[106] It is assumed that records management and records retention schedules are the means whereby appraisal is documented for government records at AM. The process, however, is not clearly laid out. Rather it seems like the procedures were written for the benefit of government agencies and the connection to appraisal documentation is more of a by-product. Therefore, while the procedures on the website are valuable for archival and records management operations, additional documents explaining the appraisal process for the average user outside of the government would make appraisal at AM more transparent.

The Hudson's Bay Company Archives (HBCA) is unique among Canadian archival institutions, and the description of its own records illustrates that status. The records of the HBCA's own functions were first arranged and described in 1992 as part of a summer student intern program, and consist of two groups of records measuring approximately 24 metres. These two groups are the records accumulated in London c. 1920-1974, and those amassed at the Archives of Manitoba since the move from London to Winnipeg in 1974. The record group contains "early finding aids and research tools

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[105]Warsaba to Henry, December 22, 2008.
[106]*Government Recordkeeping: Policies, Standards, Guidelines and Procedures* available at: http://www.gov.mb.ca/chc/archives/gro/recordkeeping/policies_standards_guidelines_procedures.html (Accessed: January 5, 2008).

which provided evidence not only of the archival process, but also offer information abstracted from the records for specific research purposes. The correspondence, administration and program files provide information on the history of the Archives. "[107] Since its establishment in 1670, the Hudson's Bay Company has created a multitude of records. About 3000 linear metres of shelf space are occupied by the company's archival records in the HBCA, including approximately 130,000 photographs, 12,000 fur trade maps, and many films and works of art. The holdings of the archives of the HBCA's own administrative records comprise twelve series and have necessitated extensive file lists.[108]

The year in which the arrangement and description of this record group took place raises an interesting point. First, 1992 was relatively early for this type of work when compared to the appearance of archival literature on archival history and the issues surrounding that subject. Second, although the HBCA is currently one of the most well funded archives in Canada, the HBCA Foundation was not established until the mid 1990s, when the Government of Canada issued a tax credit to the Company in return for transfer of the ownership of the archival records to the Government of Manitoba. This means that the project was undertaken at a time when, presumably, the HBCA had less funding for such undertakings. The fact that it was chosen as a summer student project

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[107]Deidre Simmons, *RG20 The Records of the Hudson's Bay Company Archives*, prepared August 1992: 1.
[108]The series include: Archives Department Miscellaneous Correspondence and Memoranda (London), Archives Department Administration Subject Files (London), Program Files (Winnipeg), Research Correspondence, Archives Department Records Control and History, Research Tools (including Annals), Finding Aids, Visitors Books, Letter Registers, Accession Registers, Inventories and Microfilm Workbooks. By 2007 the HBCA was undergoing a process of redescription. At that time the description for the HBCA's own records had not been revised and approved.

suggests that the HBCA saw value in the arrangement and description of its own records, and considered the time and effort it would take to obtain funding for the project to be worthwhile.

Despite the early creation of the description for its own archives, as of the 2008 survey the description for RG 20 *Records of the Hudson's Bay Company Archives* was still unavailable in the HBCA's online database.[109] Kathleen Epp reported that the delay in making the description available was related to a records management review occurring at HBCA, which includes a review of records schedules and an assessment of which series have archival value. As a result of the review HBCA was also unable to provide a current file plan.[110]

Appraisal procedures at the HBCA were also revamped in 2008 for acquisitions received from outside the company itself. The HBCA now requires the "archivist working with the potential donor to create an appraisal report which is presented to the Archivist Group in HBCA," which meets every 1-2 months to discuss archival programs and make decisions and recommendations on various issues. An Assessment of Gift form may be filled out prior to donation; the donation is finalized by the signing of a gift agreement. Those forms are then filed on the acquisition file. According to Epp acquisition of corporate records is new; HBCA and Hudson's Bay Company (HBC) are in the middle of establishing what the regular program is. That regular program will

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[109]A copy of the description is publicly available in the Research Room or it can be emailed to researchers upon request.
[110]Personal correspondence. Kathleen Epp to Christy Henry, November 5, 2008.

include heavy reliance on HBC's records schedules with the archival designation being mutually agreed upon by both institutions. The appraisal documentation created in that situation is largely the records schedules created by HBC and periodically reviewed by HBCA archivists.[111]

Of all the Provincial Archives that responded to the survey, only the Public Archives and Records Office (PARO) in Prince Edward Island did not have a pre-existing description of the records in its institutional fonds. In a 2003 email, Provincial Archivist Marilyn Bell admitted that the records of the Public Archives and Records Office are the last to receive attention. As a result, the records are not currently described in any manner that would make the Archives' administration records easily accessible to the public. Although the Public Archives and Records Office did not have such a description, Bell did send her comments on the types of documents the institution creates in the process of reference, accession, public programming, conservation and appraisal work. The documentation for reference work is limited to reference inquiries received and registrations; both are maintained for only three years.

The institution's accession work generates more documentation, in the form of accession registers and master accession files. The latter includes "correspondence, receipt forms, donor agreements, tax credits, draft and final finding aids etc. [These] are considered permanent working documents [and] may be made available to the public if they are requested as long as privacy considerations are not breached."[112] PARO does

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[111]Ibid.
[112]Personal correspondence. Marilyn Bell to Christy Henry, March 31, 2003.

not do a great deal of public programming, however it does maintain exhibition records and loan agreements that could also be made available to the public. For PARO, the most comprehensive documents are created as a result of conservation activities. The PARO technician keeps detailed reports on each preservation project; these records, like the accession files, are also kept as permanent working documents. According to Bell, there has been no demand for access to these records. The lack of demand for the documents that have been created and maintained at this repository, or at any institution experiencing the same situation, suggests that users are unaware that the Archives possesses records documenting the work that it does. This conclusion in turn raises an important question: do archivists have a responsibility to make users aware of the existence of these kinds of documents? Do these documents not represent part of the body of knowledge that an archivist possesses? And is it not the goal of the archivist to aid researchers by providing them with as complete a history of the record as possible, which in turn will only enrich their understanding of the documents?

File classification systems and appraisal documentation at PARO are also rudimentary. The PEI government's standard classification plan and retention schedule is used for administrative records, but the system is less formalized for operational records. Although PARO has created a basic classification scheme, the retention schedules are still a work in progress.[113] In 2003, Bell stated that "documentation for appraisal is perhaps our weakest point and there are very few records kept of what has been retained

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[113] John Boylan, Acting Provincial Archivist, did not want to share the file classification system for PARO's operational records as it is still in the development stage.

and what discarded, and, perhaps more important, the reasons for those decisions."[114] As

this is an accountability issue, especially with respect to government records, and because

of difficulties created with staff changes, Bell and her colleagues at the Public Archives

and Records Office hoped to improve their own documentation in this area. However,

according to Acting Provincial Archivist John Boylan, PARO still has no set paperwork

to document the appraisal process as of 2008. The decision to accept material into the

holdings is made by the Provincial Archivist, who bases his or her decision on "a

consideration of the evidentiary and secondary informational value, what concerns there

are regarding access, storage and the like and whether there is any duplication in the

material."[115] According to Boylan, little paperwork aside from informal notes is

generated.[116]

CONCLUSIONS

Initial investigations in the area of archival accountability and the creation and

maintenance of archives of archives, suggest that they are not high priorities among most

Canadian archival institutions. Canadian archives document their own actions and

decisions moderately well at best. There are institutions, such as the Archives of Ontario,

that appear not only to have a strong tradition of such activity, but also a clear policy of

making the descriptions of their work available to the public.[117] Other institutions, such

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[114]Bell to Henry, March 21, 2003.
[115]Personal correspondence. John Boylan to Christy Henry, September 25, 2008.
[116]Ibid.
[117]The existence of an archives of an archives does not in and of itself render an archives accountable.
Based on the results of this survey, the Archives of Ontario and Library and Archives Canada appear to
have the most substantial archives of archives. And yet, both were criticized by, respectively, the Auditor
General of Ontario (2007) and the Auditor General of Canada (2003) for failure to fulfill certain
responsibilities. An archives of an archives is essential for accountability, however questions may remain

as the City of Vancouver Archives, appear to be heading in the same direction. In contrast, the Public Archives and Records Office in Prince Edward Island, for the most part, has not documented its decisions, and those that have been noted are not easily accessible. University archives as a group also seem to have weak documentation practices. The majority of the Canadian archives that responded to the request for information fall somewhere in the middle. They have failed to document a portion of their decisions and their own archives have been irregularly described. Creating and maintaining such documentation does not appear to guarantee that the archives in question will make the description of and/or public access to their records significant priorities.

The impact of records management on the archives of archives is also unclear. The majority of university archives contacted did not have a strong tradition of creating, maintaining, and describing their own records. It may not be a coincidence that they are located on campuses that do not have strong records management systems. On the other hand, the municipal archives contacted were all situated within a larger records management program and all had dedicated at least some thought to the records that they create and maintain to document their work. In general therefore, effective records management systems appear to lead to the creation of records that could render archival work transparent and accountable.

However, existing records management systems do not automatically generate appraisal documentation. A records management system can bring to light areas where

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about the quality of the records created. See "Chapter 6 – Protection of Cultural Heritage in the Federal Government, Main Points, 6.3" in *2003 November Report of the Auditor General* for the Auditor General of Canada's report on Library and Archives Canada, and "Chapter 3 Section 3.01 Archives of Ontario and Information Storage and Retrieval Services" (2007) from the Office of the Auditor of Ontario for the report on the Archives of Ontario.

records are being created (and even areas where records should be created) but it does not guarantee that the records being created and maintained will be sufficient for accountability and transparency. The survey also made clear that while Canadian archives tend to follow a similar 'best-practice' when it comes to records management, there is very little consensus as to how appraisal should be documented. Of all of the archives contacted no more than half document appraisal in any way at all and none utilize the same forms or standard documents.

Without a detailed investigation of the actual files being created and maintained in each archives it is impossible to determine how successful Canadian archives are at documenting archival decisions and actions. However, at the very least, the increase in responses from 2003 to 2008, and the improvements made by some of the archives contacted, does suggest that Canadian archives are aware of the need for such documentation of their work, which is an important first step. It seems reasonable to conclude that recent societal developments will only fuel this trend: greater demand for archival accountability, based on growing public understanding of the socio-political power of records and archives, and widening interest in the study of the history of archives due to this new awareness of their key roles.

CHAPTER 4

APPRAISAL DOCUMENTATION: A CASE STUDY AT THE S.J. McKEE ARCHIVES (BRANDON UNIVERSITY)

As the previous chapters have argued, for archival functions to be transparent and accountable archives need to create and maintain records that document the work that they do. Unfortunately, the archives of archives have been given little attention in the professional literature of archivists until recently and in general remain a low priority for Canadian archives. As the documentation of all archival functions is beyond the scope of this thesis, this chapter will focus on one archival function – appraisal. First, some key work in the appraisal literature will be examined to determine what it says about the creation and maintenance of appraisal documentation. Then the chapter will consider current and past appraisal practice at one small, relatively new archives – the S.J. McKee Archives at Brandon University. The chapter will conclude by proposing appraisal documentation for the McKee Archives and a possible file classification for that institution's own records.

The decision to examine the appraisal function was based on the fact that appraisal was one of the first archival functions to generate discussion of the need to create records that document archival actions. Most of these discussions have been informed by postmodern ideas about how reality is mediated by means of communication, such as archives. The main thrust of these arguments is that appraisal work is subjective. As leading South African archivist Verne Harris notes, archivists cannot remain "exterior to the processes that they are seeking to document. The appraiser's values, quality of work, perspectives, interaction with the creators and owners

of records, engagement with the policy he or she is implementing, and so on, all become markings in the appraisal and determine what becomes the archival record."[1]

Appraisal has been viewed as the core of the archivist's work, as well as the profession's key intellectual challenge. Canadian archival educator Terry Cook states that "there has been a fundamental paradigm shift for archives (and archivists) from serving the state to serving society, and from passively preserving the records judged to have value by the state to actively collecting the records reflective of society."[2] The main implication of this paradigm shift for appraisal is that archivists, by choosing which records to keep and destroy, are selecting what is remembered and what is forgotten, as well as who in society will be visible and who invisible. Therefore, given their impact on construction of social memory through their appraisal decisions, archivists should be held accountable by society for the decisions they make.

One way in which archivists can fulfill this social responsibility is by creating records during the appraisal process that make their actions transparent. For example, Harris argues that "not only must the appraisal seek to lay bare as far as possible the layers of intervention and interpretation borne by the records being appraised; it must go beyond that by laying bare as far as possible the layering of the appraisal process itself."[3]

APPRAISAL LITERATURE

As a result of the subjective nature of the appraisal function, a number of archivists believe that appraisal archivists should document their actions and decisions. However, appraisal literature, particularly manuals dealing strictly with appraisal, tend to

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[1]Verne Harris, "Postmodernism and Archival Appraisal: Seven Theses," *South African Archives Journal* 40, (1998): 49.
[2]Terry Cook, "From the Record to its Context: The Theory and Practice of Archival Appraisal since Jenkinson," *South African Archives Journal* 37, (1995): 32.
[3]Harris: 49.

gloss over the creation and maintenance of records documenting the keep or destroy process in the same way that the general archival literature has.

The most prominent and widely consulted English-language works on appraisal published in the 1990s are by Helen Samuels, Terry Cook, F. Gerald Ham, Frank Boles, Mark Greene, Todd Daniels-Howell, and Barbara Craig. All of these works were written when archivists were dealing with growing concern about proper documentation of appraisal. This concern is related to the rising emphasis on the central importance of appraisal, which prompted renewed emphasis on the examination of appraisal theory and methods in the 1990s and to new approaches to appraisal, such as macroappraisal or approaches influenced by macroappraisal, such as Samuels's 1992 "documentation strategy" and Greene and Daniels-Howells's "Minnesota Method." The foundation of these approaches to appraisal is the view that a more intensive and sophisticated, research-based approach to appraisal is needed to do this increasingly important task. The new approaches implied a growing concern about documenting appraisal adequately for accountability and other purposes, such as internal administration, so that the work can be done in a more efficient and consistent manner. Samuels, Ham, Boles, Craig and early pieces by Cook all reflect these ideas, but none of them specify in any detail the nature of the recommended new range of documentation itself.

One of the most prolific writers on the subject of appraisal in the archival profession is Terry Cook. Two of his most important works on appraisal will be discussed. In his first major article on appraisal published in 1992,[4] Cook articulated the concept of macroappraisal. Dissatisfied with the traditional value-through-use model of

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[4]Terry Cook, "Mind Over Matter: Towards a New Theory of Archival Appraisal," in *The Archival Imagination: Essays in Honour of Hugh A. Taylor*, ed. Barbara L. Craig (Ottawa: Association of Canadian Archivists, 1992).

appraisal,[5] Cook developed an appraisal strategy that would focus on preserving records

that would, over time, present the clearest image of society as reflected in its structures

and functions. In Cook's words,

> macro-appraisal moves from the mind or purpose or broad societal
> function of the records creator, through various structures and processes
> designed to implement that function, to information systems created to
> produce and organize records that permit those processes to work, and
> finally to the records themselves which document all the foregoing as well
> as at the case file level the impact of the function and structure on the
> citizen and, as important, that of the citizen on the function and structure.[6]

Macroappraisal involves a research-based, top-down approach to appraisal. It is based on

the idea that in order to appraise responsibly, the archivist must research the "history of

records and records creators" being appraised.[7]

After discussing how traditional appraisal theory and practice have failed the

profession and archival users, Cook outlines the broad theory behind his proposed model.

The basis of his argument is that appraisal needs to shift its focus from trying to select

(directly) useful information content in records (the value-through-use approach) to the

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[5]When discussing the events that led to the creation of macroappraisal, Cook later wrote that "the experience with the Deschênes Commission shattered my faith in the Schellenbergian value-determination appraisal paradigm on which I had been raised as an archivist, and equally exposed the moral ambiguity of the archivist's passive, ad hoc approach to conducting appraisal. . . The Deschênes Commission made it abundantly clear that appraisal based on empathy, intuition and experience did not amount, in Booms' words, to 'self-evident standards of value,' to say the least. Such an approach was simply no longer ethically defendable in an era of greater accountability." See Terry Cook, "Macroappraisal in Theory and Practice: Origins, Characteristics, and Implementation in Canada, 1950-2000," *Archival Science* 5 (2005): 119. Schellenberg's appraisal theory was built on the belief that records have certain inherent values: "primary values" – administrative, legal and fiscal – are what make records valuable to their creators; and "secondary values," which are the archivist's main concern, are the historical uses the records could support. Macroappraisal rejected this value-through-use model. Cook and macroappraisal were influenced by German archivist Hans Booms's argument that appraisal should aim above all to reflect core societal values. In particular, macroappraisal embraced Booms's idea that social values could be identified in records through research into the functions of records creators -- who have been chosen, in effect, by society to perform roles that implement its wishes. In this way, archival appraisal could still support the growing variety of uses of archives while resisting the push and pull of particular fashions in uses, or the most powerful users. Macroappraisal has been adopted at Library and Archives Canada and several other major archives such as the National Archives of Great Britain, the National Archives of Australia, and Archives New Zealand.
[6]Cook, "Mind Over Matter:" 53.
[7]Ibid., 51.

societal context of their creation. In his model the key question becomes "who – in articulating and implementing the key functions of the institution (as assigned it by the broader society) – would have had cause to create a record, what type of record would it be, and with whom would the corporate person cooperate in either its creation or its later use?"[8]

Cook then lays out a two-step model for implementing his theory of appraisal. The first step in the macroappraisal methodology requires that archivists rank the importance of the functions of the records creators or agencies to their parent bodies and society. The agencies performing the most important functions are most likely to provide the best documentation of their institutions and society. In addition to focusing the appraisal on the most promising structures (or agencies), prioritizing also allows the appraising archivist to locate functional overlap among records creators and thereby avoid duplication in appraisal and acquisition.[9]

The second part of the model is concerned with locating what Cook calls "hot spots" of interaction between function (programme), structure (agency) and citizen (or client, if the institution is not a state). In this step, the archivist investigates the interaction between the programme, agency and citizen in each of the ranked structures to determine where and what kinds of documents will best reflect the image of society the archivist is trying to document through the appraisal. The programme (function) "is the purpose, intent, idea, even the theory or ideology, defining a particular institutional function. In other words, it is the corporate mind --- the site of policy and decision-

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[8]Ibid., 47.
[9]Ibid., 54.

making."[10] The agency is the "administrative structures created by the state to implement the functional imperatives society demands."[11] Of concern here is the agency's personnel, organization and information systems. The archivist then analyzes the interaction of the citizen or client of the agency with the agency and programme to locate "hot spots" of such interaction where significant, precedent-setting, perhaps controversial matters create records that best document an image of society. After performing the broad macroappraisal and then also locating "hot spots" archivists then utilize more traditional appraisal criteria (what Cook refers to as "microappraisal") to appraise the actual records, according to their age, extent, completeness, physical condition, and so on.

Although Cook notes that since the 1970s archivists have begun to agree that appraisal needs to be better documented,[12] he does not discuss the types of documents that should be created to document macroappraisal in his path-breaking 1992 article. Nor does he discuss what should be done with the documentation generated as part of the research process. In recent work, however, such as his article "Macro-appraisal and Functional Analysis" published in 2007, he focuses more attention on the accountability of the archivist in appraisal. Cook notes that "because of the complexity of appraisal, its societal importance and its subjectivity, archivists and their institutions should be held accountable for their decisions through full and transparent documentation of their contextual research, appraisal process, keep-destroy decisions, and resulting transfers of records, and should create and implement benchmark standards against which the

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[10]Ibid., 55.
[11]Ibid., 56.
[12]Ibid., 48.

appraisal process itself can be judged."[13] It is obvious that Cook has become more

concerned with the ability of archivists to be accountable for their work. Furthermore,

his argument is not just that archivists should be able to defend their decisions but that

they should be required to do so. All of this is rooted in awareness that through appraisal

"we archivists are literally co-creating archives. We are making history. We are

exercising power over memory."[14]

The primary means by which archivists document the appraisal process in

macroappraisal is the "Archival Appraisal Report." Cook characterizes it as "an

accountability and audit trail for the appraisal process, in the same way that other

business processes of government should be conducted in a transparent and accountable

way."[15] However, aside from noting that the five-step process of macroappraisal and the

resulting research should form the text of the "Archival Appraisal Report,"[16] he does not

discuss the creation of the document or how it should be maintained by an archives in

order to ensure that the archives can defend its appraisal decisions.

Although the two Cook articles discussed here do not say a great deal about the

appraisal report, macroappraisal was conceived in part as a means of making archival

appraisal decisions more transparent and accountable. Cook, who worked at the then-

National Archives of Canada (NAC) when he developed the macroappraisal concept in

the late 1980s, was one of two key NAC witnesses asked to testify in 1985 before the

Deschênes Commission inquiry on War Criminals when it investigated whether the

destruction of federal immigration case files by the NAC made it possible for Nazi war

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[13]Cook, "Macro-appraisal and Functional Analysis:" 6-7.
[14]Ibid.
[15]Ibid., 12.
[16]Ibid.

criminals to enter Canada undetected. Although the NAC was cleared of any wrongdoing, Cook was prompted by the situation to note that the NAC had failed to document appraisal well enough. Robert Hayward, the other NAC archivist required to testify before the Commission, remarked, as quoted by Cook, that "'the experience forced the government archives division to look carefully at what it was doing and sharpen its focus on how improvements could be made.' We realized collectively that 'our work was open to public examination and we were being held accountable for our actions, and that we should take whatever measures were needed to improve our selection and scheduling in that term's purest scientific sense'."[17] As these circumstances helped drive the development of macroappraisal, it is not surprising that macroappraisal involves a great deal more thinking about how to document appraisal and to address certain questions: how much information is enough to do so, and how should it be obtained within the often limited time available to conduct an appraisal, especially since macroappraisal usually involves appraising records at a much younger age than earlier appraisal strategies?

Using the macroappraisal methodology, the means by which archivists can document their decisions is the Appraisal Report. According to the NAC's – now Library and Archives Canada's -- "Appraisal Methodology: Macro-Appraisal and Functional Analysis, Part B: Guidelines for Performing an Archival Appraisal on Government Records" the Appraisal Report "has been designed to both reflect the records disposition business process and to serve as an accountability and audit trail in the same transparent way that other business processes of government are conducted."[18] As

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[17]Robert J. Hayward, "'Working in Thin Air': Of Archives and the Deschênes Commission," *Archivaria* 26 (Summer 1988): 130-31, as quoted in Cook, "Macroappraisal in Theory and Practice," 117.
[18]Terry Cook, "Appraisal Methodology: Macro-Appraisal and Functional Analysis, Part B: Guidelines for Performing an Archival Appraisal on Government Records" available at:

decision-making on the archival value of records is largely based on original research and analysis, the Appraisal Report is designed to be "as comprehensive as possible of the processes of analysis required to report records disposition decisions. . . ."[19] As a result, macroappraisal requires more time and effort be spent on creating documentation than other more traditional appraisal strategies.

This awareness of the need to document the appraisal process is why, under improved circumstances,[20] as an archivist for Brandon University in Brandon, Manitoba, I would use macroappraisal or a modified version of it, to document appraisal of the university's records. Due to the size and resources of Brandon University and its S.J. McKee Archives, it is difficult to predict whether a full macroappraisal program would be possible. Nevertheless, whatever appraisal strategy the McKee Archives ultimately chooses to adopt, I would like to see a number of macroappraisal elements incorporated into it, namely functional analysis and the focus on the interaction between the university and its students, the 'citizens' or clients, to use Cook's wording. Suggestions for the actual documentation will be discussed later in this chapter.

As a supplement to archival practice, Helen Samuels championed the "documentation strategy" as both an appraisal theory and methodology in the early 1990s. Influenced by Cook, the documentation strategy is based on functional analysis

http://www.collectionscanada.gc.ca/government/disposition/007007-1041-e.html (Accessed: December 31, 2008).

[19]Richard Brown, "Drafting an Appraisal Report for the Disposition of Government Records" (National Archives of Canada Government Records Branch, February 2001): 3. Personal correspondence. Caryn St. Amand to Christy Henry, February 27, 2004.

[20]The implementation of macroappraisal at the McKee Archives would require a significant commitment from the administration of Brandon University. A records management system would first have to be established, and staff in the archives would need to be increased from the current 1.5 employees. Due to the significant research into agency functions, structures, and record-keeping systems required by macroappraisal, the Archives would also need to be given latitude to dedicate considerable resources to the project.

and the postmodern idea that archivists actually shape the creation of records and thus knowledge of the past. Samuels explains that,

> The key elements of documentation strategy are an analysis of the universe to be documented, an understanding of the inherent documentary problems, and the formulation of a plan to ensure the adequate documentation of an ongoing issue or activity or geographic area. The strategy is designed, promoted and implemented by records creators, administrators (including archivists) and users. It is an ongoing cooperative effort by many institutions and individuals to ensure the archival retention of appropriate documentation through the application of redefined archival collecting policies, and the development of sufficient resources.[21]

The documentation strategy therefore requires the active intervention by the archivist (among others) in the *creation* of archival records. This is not just a matter of how the archivist's subjectivity can influence the selection of records for display in an exhibit, for example, but rather that the archivist decides what functions in the records universe need to be better documented, and then takes steps to ensure that those documents are created and maintained. However, despite this significant intervention by archivists (that would undoubtedly affect the archival record), Samuels does not discuss archiving the records that are created to research and conduct the documentation strategy process. These records should become part of the archives of the archives involved in the process.

Samuels's book on the application of the documentation strategy -- *Varsity Letters: Documenting Modern Colleges and Universities* (Metuchen NJ and London, 1992) -- does discuss the archives of archives, but only briefly. *Varsity Letters* breaks down the responsibilities of colleges and universities into seven key functions worth documenting, the last of which is promoting culture. What is interesting about this

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[21]Helen W. Samuels, "Improving Our Disposition: Documentation Strategy," *Archivaria* 33 (Winter 1991-92): 126.

particular function is that it encompasses archives (as well as libraries and museums) as an area worth documenting. Samuels argues that college and university archives were initially established to facilitate and complement specific teaching and research needs, but over time the collections in the archives have become a social obligation.[22] As key educational resources being maintained and promoted by the institution, the work of selecting and managing these collections should be documented. In particular, Samuels argues that

> Administrative records of library, museum, and archival officers should provide evidence of the changing policies toward the development and management of the collections: acquisition and deaccessioning of materials; . . . policies on access and use of the holdings; and allocation of resources for acquisitions, preservation and staff.[23]

Samuels also lists records such as deeds of gift, as well as documentation on how the collections were organized, exhibited and processed as materials that should be part of the archives administrative records.[24]

Even though Samuels's consideration of the archives of archives is one small part of her overall approach to appraisal, she is to be commended for including it. Furthermore, she includes legal and administrative reasons as a rationale for creating and maintaining the archives of archives.[25] In other words, she is alert to the accountability of the archives. The value of her study for the current discussion therefore is that unlike the majority of archives manuals, *Varsity Letters* acknowledges and advocates the creation and maintenance of records documenting archival work, even if she has not focused on that matter exclusively.

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[22]Helen Willa Samuels, *Varsity Letters: Documenting Modern Colleges and Universities* (Metuchen, NJ & London: The Society of American Archivists and The Scarecrow Press, Inc., 1992): 246.
[23]Ibid., 249.
[24]Ibid., 250.
[25]Ibid., 249.

Of all of the works on appraisal examined here, American archivist F. Gerald Ham's *Selecting and Appraising Archives and Manuscripts* (Chicago, 1993)[26] is the only one that actually examines ways to document appraisal.[27] In his chapter "Conducting the Appraisal," Ham lists the appraisal report as one of the final steps in the appraisal process, stating "disposition recommendations, especially those that may be controversial or involve complex or sensitive records, should be thoroughly documented in a written appraisal report."[28] The components of Ham's appraisal report include: the name of the office that created the records; the major functions and activities of the creating office, as well as its position in the administrative hierarchy; a description of the records (including title, dates, extent, types of records, informational content and gaps in the record); an analysis of whether the records fall within the archives' acquisition policy; an analysis of how the records meet institutional appraisal criteria; steps to be taken if the records are accessioned; the appraiser's opinion as to the value of the records; and finally the appraiser's retention recommendation with accompanying justification.[29] To accompany his discussion, Ham provides an example of a completed appraisal report.

Although Ham advocates documenting the appraisal process through the appraisal report, he does not discuss in any detail what should be done with the report once it is completed or how it might fit into an archival records management system. The only

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[26]Written around the same time that macroappraisal was being developed at the then National Archives of Canada, Ham's manual does not discuss that particular appraisal strategy directly; it does discuss functional analysis as a possible appraisal tool but only as one of five basic tools for evaluation. Ham's manual and macroappraisal, however, are both based on the belief that appraisal reflects the "broader, ever-changing external social, cultural and technological environment" (p. 14) in which the records were created.

[27]This is particularly interesting as Ham's manual is in the initial SAA Archival Fundamentals Series. As will be discussed below, the subsequent volume on appraisal in the series (by Frank Boles) does not place the same emphasis on the appraisal documentation that should be created.

[28]F. Gerald Ham, *Selecting and Appraising Archives and Manuscripts* (Chicago: The Society of American Archivists, 1993): 71-72.

[29]Ibid., 72.

point he makes in his manual that seems to refer to records management for archives comes at the end of his chapter on accessioning. In the concluding summary of that chapter he states, "the selection process generates important basic information about an accession. This information should be integrated into a 'process control' system so that it can be utilized for many subsequent archival functions ranging from arrangement, description and access to storage, preservation and statistical accounting."[30] While he does not elaborate on the 'process control system,' it is evident that Ham advocates the creation and maintenance of records that document archival work.[31]

American archivist Frank Boles's *Selecting & Appraising Archives & Manuscripts* (Chicago, 2005) is a title in the Society of American Archivists' Archival Fundamentals Series II. Accepting the postmodern premise that archives are socially constructed, Boles makes a number of interesting points regarding archives and appraisal. However, although his manual adds to the growing emphasis on documentation, due at least in part to his endorsement of the "Minnesota Method" developed by Mark Greene and Todd Daniels-Howell (an appraisal methodology inspired by macroappraisal), Boles does not elaborate much on the documents needed to document appraisal adequately.[32]

Boles states that archivists have had difficulty accepting their responsibility for selecting archival records because they prefer to see themselves as keepers of records, not their destroyers, or as "part of a noble endeavour dedicated to preserving the past's

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[30]Ibid., 90.
[31]Ham also mentions the creation and uses of retention and disposition schedules for institutional records, as well as deeds of gift for private donations as documents related to appraisal that would also be incorporated into his 'process control system.' See Ham, *Selecting and Appraising Archives and Manuscripts*: 81-90.
[32] Mark Greene and Todd J. Daniels-Howell, "Documentation With An Attitude: A Pragmatist's Guide to the Selection and Acquisition of Modern Business Records," in James M. O'Toole, ed., *The Records of American Business*, (Chicago: Society of American Archivists, 1997).

recorded legacy . . . ."[33] Such discriminatory appraisal, however, he argues, is a necessary part of archival work for two reasons. The first is that societal resources will never be sufficient to maintain every record created. And if so, archivists are the best qualified professionals to undertake the task. He also cites another consequence of failing to accept the responsibility for appraisal: "the greater consequence of ambiguity among archivists over selection is that our professional reluctance to abandon the role of keeper opens the door to criticism that archivists have failed in that mission."[34] This argument is a reference to archival accountability; however, unlike some other archivists, who argue accountability is mainly a legal and administrative issue, Boles links it to the cultural mission of archives. This is an important connection, as archives are accountable not only for specific legal and administrative actions, but also for their contribution to the construction of social memory.

Following an overview of appraisal thought and various appraisal approaches, which in and of themselves are a kind of archival history, Boles focuses on the "Minnesota Method." While it is not necessary to go into the details of that appraisal method, it is worth noting that under his section on "Selecting Records," Boles states that archivists rarely document how selection decisions are made:

> Despite the critical nature of selection, archivists seldom leave written descriptions of how and why a particular set of records was accepted or rejected. This lack of documentation seems quite peculiar, and perhaps reprehensible, because it occurs within a profession that, when dealing with institutional records, calls on everyone else to document applications of policy in practice. A 'do as we say, not as we do' attitude has clearly been taken by most archivists on this issue. Documenting the selection

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[33]Frank Boles, *Selecting & Appraising Archives & Manuscripts*, (Chicago: The Society of American Archivists, 2005): 5.
[34]Ibid., 7.

decision is an important action that all archivists who make these decisions should implement.[35]

Unfortunately, although Boles provides two hypothetical scenarios for archival appraisal, his manual does not provide any concrete suggestions on how appraisal should be documented. In fact, his discussion of reappraisal and accessioning provides more on the documents that could be created than does his discussion of the major initial appraisal actions an archives takes. While this is likely due to the fact that his manual is based on the reality that there is no one appraisal methodology that will work for every archives in every situation, his advocacy for appraisal documentation is the weaker for this omission.

Barbara Craig's book *Archival Appraisal: Theory and Practice* (Munich: K.G. Saur, 2004) makes explicit reference to the need for documentation during appraisal.[36] Echoing her earlier work, Craig again makes repeated reference to the need for documentation of the appraisal process, stating, "appraisal, by definition, is not value free: in fact, it seeks to apply values not to deny them. Nevertheless, appraisal can be, and probably always should be, transparent, especially in declaring the point of view from which it is undertaken. . . Since the aim of appraisal is to give people and groups a voice in the future through their records, appraisal decisions need to be recorded, to give appraisers working in the present an equally clear voice in which to speak to the

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[35]Boles, *Selecting & Appraising Archives & Manuscripts*: 111. Boles wrote a similar overview of appraisal theory in his *Archival Appraisal* (New York: Neal-Schuman Publishers, Inc., 1991). Although he is not as explicit there about the issue of bias in selecting records as he is later in *Selecting & Appraising Archives & Manuscripts*, Boles does acknowledge the fact that the subjective nature of appraisal needs to be made known rather than hidden. See Frank Boles and Julia Marks Young, *Archival Appraisal*: 98-100.

[36]Barbara Craig, *Archival Appraisal: Theory and Practice* (Munich: K.G. Saur, 2004). Craig states that *Archival Appraisal: Theory and Practice* is an introduction to the concept, value and historical development of appraisal. Although the text discusses various methods and tools, it does not endorse any particular appraisal strategy, arguing that appraisal should be tailored to each organization's needs. Instead *Archival Appraisal* examines the current points of consensus for appraisal, two of which are some kind of functional analysis (at least for institutional records) and the need for appraisal documentation.

future."[37]   In fact, Craig lists consistent documentation practices of both decisions and rationales as one of the foundations of a sound appraisal program, and further states that documenting appraisal (as well as acquisition) is necessary for future accountability.[38] For her, appraisal documentation serves to make appraisal accountable and understandable to future generations (both users and other archivists).[39]

Although Craig mentions appraisal documentation as necessary at various points throughout her book, in Chapter Six she outlines what she calls "the components of an appraisal architecture." Craig's appraisal framework "encompasses ideas, concepts, and beliefs, along with theories, methods and procedures" expressed in formal documents "that will ensure the repositories and practitioners of appraisal are accountable and responsible."[40]   The documents that form her 'appraisal architecture' are primarily foundation documents: the mission and/or mandate of the institutions; a glossary of working definitions for archival terms and concepts used in the documents; the acquisition policy; the appraisal policy; and a policy that outlines the terms of public access to those and other archival documents.[41]

While Craig's emphasis on access to archival documentation is an important contribution to discussions of the archives of archives, the components of her 'appraisal architecture' are fairly standard in archival manuals. Later in the chapter she does mention appraisal reports and position papers as useful documents but she does not go into detail or provide examples. To her credit, Craig does give some consideration to the types of documents accountable and responsible appraisal would require, however the

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[37]Barbara Craig, *Archival Appraisal: Theory and Practice*, (Munich: K.G. Saur, 2004): 19.
[38]Ibid.: 4-5.
[39]Ibid., 3-5.
[40]Ibid., 115.
[41]Ibid., 116.

main contribution of *Archival Appraisal* to the subject of the archives of archives is its sustained focus on the need for and uses of appraisal documentation, not a discussion of the actual documents themselves.

S.J. MCKEE ARCHIVES (BRANDON UNIVERSITY)

In 1975 Brandon University, in cooperation with Manitoba Pool Elevators, established the Rural Resources Centre. The centre, which was the first archival repository at Brandon University, was intended to "provide rural Manitoba with resource materials for use in the discussion and analysis of problems related to rural social development."[42] The centre was mandated to collect both published and archival material related to a number of topics, including Manitoba Pool Elevators, cooperative societies, churches, school districts, Women's Institutes and personal papers. It was also charged with collecting a photographic archives of rural Manitoba.[43] Originally the university provided staff and space for the centre, while Manitoba Pool Elevators provide money to support its operations.

Brandon University transformed the Rural Resources Centre into the Brandon University Archives in 1978. While the archives appears to have continued operating under the centre's mandate,[44] it was also given the responsibility of collecting and preserving Brandon College's archival records.[45] The archives' mandate was extended to

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[42]McKee Archives Mandate – Rationale in McKee Archives – Origin/Mandate, RG 6 Brandon University fonds, 8.2.1 S.J. McKee Archives general records, unprocessed records.

[43]Michael G. Moosberger, *External Review of the Brandon University Archives*, 1995: 2. The external review commissioned by Brandon University in 1995 to review archival operations was conducted by Michael Moosberger, then the Acting Head, Archives & Special Collections, University of Manitoba Libraries. It came to be known as the 'Moosberger Report'. See RG 6 Brandon University fonds, 8.2.1 S.J. McKee Archives general files, unprocessed records (File: Moosberger Report – McKee Archives 2).

[44]The records of Manitoba Pool Elevators and other collections that fall under the original Rural Resources Centre mandate are held by the Brandon University Archives.

[45]Brandon College was established in 1899 as a Baptist college. From 1899 to 1939 it was affiliated with McMaster University and from 1939 to 1967 it was affiliated with the University of Manitoba. Brandon

include Brandon University records up to 1977 by a Board of Governors' motion on July 25, 1985. Despite motions by the Board of Governors recommending the creation of committees to deal with archival, academic, legal, and confidential matters, it is not clear that the committees were established and by 1995 there did "not appear to be any motion that was ever passed that established the University Archives as a legal entity within Brandon University."[46]

The Brandon University Archives was renamed the S.J. McKee Archives in 1990 and in 1997 the board passed a revised mandate for the archives entitled the *University Archives Policy*.[47] The policy provides for the existence of an archives at Brandon University that acts as "the sole repository for all records of archival value which have been generated by the University (or Brandon College) and/or which relate to the history and mandate of Brandon College/University." The policy also establishes a number of guidelines for the archives, among which are the responsibilities of the University Archivist. These include the responsibility to "appraise, collect, preserve, describe and make accessible non-current but important and historically valuable documents and records in accord with the acquisition and deaccession policies of Brandon University. . ."[48] At the time this thesis was written neither an acquisition nor deaccession policy had been created by the university. The policy also makes provision for continued financial

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College became Brandon University in 1967 with the passing of a provincial order-in-council that granted Brandon University the right to grant degrees. The original mandate of the Brandon University Archives pertained only to pre-1967 records, i.e. those created by Brandon College.

[46]Moosberger, *External Review:* 3.

[47]The revised mandate in 1997 was the direct result of Moosberger's report. Moosberger was commissioned in part by the university to recommend ways of improving the management of the archives so that the archives could meet the Association for Manitoba Archives' (AMA) requirements for institutional membership. To satisfy the AMA, there had to be a clear statement from the university that it sanctioned the archives existence and had given it a mission statement. The *University Archives Policy* was revised in March 2006.

[48]*University Archives Policy* (March 23, 2006) available at: http://www.brandonu.ca/admin/policies/University%20Archives%20Policy.pdf (Accessed November 26, 2008).

support from the board, as well as a secure and designated space for the storage and handling of the Brandon University Archives.

In 2008 as part of the AMA accreditation process the McKee Archives drafted a number of new policies, among which was an Acquisition Policy. Under the *S.J. McKee Archives Acquisition Policy*, which was approved by Library Council on February 27, 2008, the mandate of the archives now extends beyond the records of the university itself to include records of selected faculty members, staff members and alumni, and records created outside the university that support its research and teaching programs, with particular emphasis on records related to rural development, education, agriculture, health studies, First Nations and the City of Brandon.[49] This significantly broader mandate is an attempt by archives staff to amalgamate the older Rural Resources Centre mandate (and its resultant collections) with the mandate of the *University Archives Policy*.

The archives of the McKee Archives is minimal, particularly for the years 1978-1997, and thus conforms to the general pattern of underdevelopment of the archives of archives. During that period the archives generated only a handful of accession records and annual reports. Furthermore, although some descriptions were created, they were generally item or file level lists, without any biographical/administrative or custodial histories. Few of them met archival standards. In addition to this lack of intellectual

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[49]*S.J. McKee Archives Acquisition Policy* available at: http://www.brandonu.ca/Library/archives/policy_documents/SJ-McKee-Archives-Policy-%20Acquisition-Policy.pdf (Accessed: December 30, 2008). The mandate outlined in the Acquisition Policy was also approved by the Archives Sub-committee (November 17, 1999) and by Senate (March 14, 2000) as part of an earlier incarnation of the current McKee Archives' Acquisition Policy. The University Archivist reports to the University Librarian and through the Librarian to the Vice-President (Administration & Finance). The University Archivist participates in the Library's administrative council, referred to as the Library Council or the Library/Archives Council. This body concerns itself with budgetary and administrative policy for both the library and the archives. Budgetary and administrative policy for the archives is generally received and approved without much debate, the presence of the University Archivist on the council provides an opportunity for the archives to shape budgetary and administrative policy and in that process advance the interests of the archives.

control over the collections, the archives also lacked physical control of many of its records during this time. As a result, the archives and the university received complaints from both faculty and community members about inadequate access to the archives. These concerns led the university to commission an external review of the archives conducted by Michael Moosberger in 1995.[50]

Since 1997 staff at the McKee Archives has worked to rectify the weak management that characterized the archives' first twenty years. A number of policies have been created and approved[51] and the bulk of the records in the archives now have accession records and fonds level descriptions. The archives has also created and maintained records documenting monetary appraisals, preservation, reference services and exhibits. For the most part, however, aside from the accession and description records, which are generated through a database, the records in the McKee Archives own archives are not standardized; there are no forms or established procedures to ensure that records created by the archives are uniform and complete. The time and resources dedicated to placing the archives on a firmer administrative foundation has left little time

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[50]The Moosberger report made a number of recommendations regarding the Brandon University Archives, including: that the Board of Governors establish a formal mandate and statement of purpose for the archives; part of the archives' mandate should include responsibility for a records management program; the University Archivist be required to submit an annual work plan with proposed goals and activities; a new detailed job description be written for the University Archivist and that it be used for an annual or bi-annual performance review; better handling of grants and improved supervision of staff by the University Archivist; the development of various operational policies; the use of deeds of gift; the establishment of advisory committees for the archives; retrospective accessioning of all collections; limiting descriptions to the fonds, series and file level and including administrative histories; developing a strategic plan for processing its backlog; and formalizing access hours. Details on the preceding recommendations are available in the Moosberger report. See RG 6 Brandon University fonds, 8.2.1 McKee Archives general files, unprocessed records. (File: Moosberger Report – McKee Archives 2).
[51]Policies created by the archives relate to access, acquisition, arrangement, description, and preservation. The policies are available on the archives' website at: http://www.brandonu.ca/Library/archives/policies.asp (Accessed November 30, 2008).

for appraisal as such.[52] As the sole employee in the McKee Archives for the majority of

the last ten years, Tom Mitchell, who, in addition to being the University Archivist,

shoulders teaching and research responsibilities in the university's history department,

has had to prioritize. He explains:

> In the varied activities of the Archives since 1997, appraisal has been a
> low priority. Largely because I was convinced that the initial job that
> needed to be completed was administrative, i.e. some basic accession
> record had to be established in order to make the archives viable
> administratively. In the absence of an accession record there was no
> administrative control of the holdings.[53] Appraisal involves intellectual
> control. It involves time. And I was short of time.[54]

Instead Mitchell decided that in the process of accessioning material no decisions of a

capricious nature were to be made about culling records from the Archives within

particular fonds or generally.[55]

The appraisal function has also been affected, as the ability of the McKee

Archives to fulfill its mandate to archive the University's records is seriously

compromised by the fact that Brandon University has never had a records management

system with records retention schedules approved by the archives.[56] The result is that the

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[52]This situation is not unique to the McKee Archives. As previously noted in Chapter 3 of this thesis, a number of Canadian archives, particularly university archives, have concentrated time and resources on archival functions other than appraisal. And, as Barbara Craig's research shows, only 15% of the 75% of Canadian archivists doing appraisal considered it their primary responsibility. In terms of time spent, appraisal tied for fourth (with records management) among archival tasks, after management, arrangement/description and reference. See her "Doing Archival Appraisal in Canada. Results from a Postal Survey of Practitioners' Experiences, Practices, and Opinions," *Archivaria* 64 (Fall 2007): 24.
[53]There may have been accession records, but Mitchell was unable to locate any in the disarray. Conversation with Tom Mitchell, University Archivist, S.J. McKee Archives on December 8, 2008.
[54] Conversation with Mitchell, December 8, 2008.
[55]Ibid.
[56]It has been the position of the university administration that records management should be the responsibility of the archives; it was proposed to Mitchell that he assume responsibility for developing and maintaining a records management system for the university at the time he took over the Archives. Having already agreed to teach, tend to the archival collection and engage in academic writing, Mitchell declined the responsibility for records management, later stating that it was "inconceivable that I could resurrect the archives, renew my career teaching, tend to writing projects that I had already begun and undertake a new campus-wide project dealing with institutional records." Since 1997, the University Archivist has remained unwilling to assume that responsibility without additional staff, storage, and financial resources. At the time

archives is still very much a passive recipient of any archival materials that are offered to it on an ad hoc basis. Although the archives' staff does make every effort to develop relationships with various offices and individuals on campus in an effort to encourage the transfer of institutional records, it has no way of enforcing records transfers through means such as scheduling. In addition, archives staff is largely unaware of the extent or content of the records universe as it pertains to the university's institutional records. As a result, the staff rarely tackle appraisal in any significant way[57] because it is reluctant to make keep-destroy decisions on the small percentage of records that has been transferred to the archives. The culling of duplicates and routine financial invoices/receipts is as in-depth as appraisal usually gets. As a result of these factors neither an appraisal strategy nor records management policy was developed by the Archives or requested by the University.[58]

DOCUMENTING APPRAISAL AT THE S.J. MCKEE ARCHIVES

In her dissertation on accountability and appraisal, Jennifer Marshall explains that "the role of appraisal documentation is to provide an explanation which renders the appraisal process and particular selection decisions open and transparent by providing an intellectual framework for appraisal activities and articulating the rationale behind particular disposition decisions."[59] Such a framework ensures that appraisal is conducted

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this thesis was written, the archives had recently agreed to develop a proposal to assume the records management function. Conversation with Tom Mitchell, University Archivist, on December 8, 2008.

[57]The McKee Archives has conducted appraisal on personal manuscript collections and the collections of former students, faculty and staff, however that discussion is beyond the scope of this thesis.

[58]Also, responsibility for setting terms of access to university records in the McKee Archives under Manitoba's Freedom of Information and Protection of Privacy Act (FIPPA) lies with the Vice-President (Administration & Finance).

[59]Jennifer Alycen Marshall, "Accounting for Disposition: A Comparative Case Study of Appraisal Documentation at the National Archives and Records Administration in the United States, Library and Archives Canada, and the National Archives of Australia," (Ph.D. Thesis: University of Pittsburgh, 2006): 207.

in accordance with relevant laws and through standard procedures. The result is that "appraisal decisions" are seen as "carefully reasoned professional judgements and not arbitrary and capricious choices."[60] However, without an established or even promised records management system on campus the ability of the McKee Archives to undertake appraisal for Brandon University's institutional records is limited. Nevertheless this section of the thesis will examine the Archives' current appraisal documentation practices before suggesting documentation that could be used to document appraisal accountably and transparently in the future. Finally, a file block classification system will be suggested for the McKee Archives' own archives of archives.

At the time this thesis was written the McKee Archives had only just begun to try to document its appraisal decisions. In the past, archives' staff noted, either on the accession form or in the fonds/collection description, certain appraisal decisions. However this practice has not been carried out consistently,[61] nor do the notes usually mention why certain records were culled. These notes merely state the types of documents that were destroyed. More recently the archives has developed a processing form that includes space for recording appraisal decisions. The form allows the appraisal archivist to record the following: the extent of the collection before and after appraisal; what records were culled from the collection; and the criteria used to make appraisal decisions. Completed processing forms are filed in the relevant collection file. While this represents a beginning for appraisal documentation at the McKee Archives, the form is still in development and has only been tested on private records collections. Staff is unsure of how effective the form will be in documenting appraisal decisions for

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[60]Ibid., 208.
[61]A keyword search for "culled" in the McKee Archives database returned only 17 results. At the time this thesis was written the database contained over 7000 descriptions.

institutional records. Clearly additional work needs to be done at the McKee Archives if its appraisal decisions are to be rendered accountable and transparent.

Appraisal theory and methodology tend to rely on the existence of records management systems and/or past practice of appraisal. Barbara Craig's survey of Canadian archives reveals that "most respondents . . . consulted and valued the reports prepared in previous appraisals (61.4%)."[62] Macroappraisal, at least as applied at Library and Archives Canada (LAC), also relies on the Records Disposition Authorities Control System (RDACS), which contains macroappraisal functional-structural research.[63] As there is no history of either records management or past appraisal at Brandon University, developing effective appraisal practices at the McKee Archives is made more difficult. These past appraisals would be valuable tools with which to improve documentation practices and evaluate the effectiveness of past appraisal documentation. Without these past practices to rely on, I suggest that any appraisal documentation at the McKee Archives begin by meeting the accountability requirements for appraisal documentation suggested in Jennifer Marshall's dissertation.[64] These accountability requirements include laws that relate to disposition and the policies, procedures, strategies and frameworks the organization has adopted to deal with appraisal.[65] Marshall's research found that LAC's approach to macroappraisal meets the listed requirements. Therefore macroappraisal at LAC is a suitable model to try to adapt to the McKee Archives.

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[62]Craig, "Doing Archival Appraisal in Canada:" 21.
[63]Cook, "Macroappraisal in Theory and Practice:" 154.
[64]Marshall lists two additional accountability requirements for appraisal documentation in her dissertation: professional accountability and cultural and historical accountability. The former refers to appraisal practices that conform to best professional practice and ethical standards, while the latter considers the importance of appraisal decisions for society's collective memory. The McKee Archives should consider both requirements when developing appraisal documentation. However, consideration of these accountability requirements is beyond the scope of this thesis. See Marshall: 207-217.
[65]Ibid., 211.

Although the McKee Archives' mandate, as stipulated in the *University Archives Act*, assigns responsibility for the institution's records to the archives, including their appraisal, the act would need to be amended in such a way that the archives' right to appraise and dispose of university records is made more clear. Additional detail and clarity regarding the archives' role in appraisal through the act would enable the archives to meet the legal accountability responsibility proposed by Marshall. In the same vein, the archives would need to develop policies and procedures specific to appraisal in order to comply with institutional accountability. The importance of these two accountability requirements for appraisal documentation are that they establish the archives' authority for the appraisal function and "provide the standards or benchmarks against which particular disposition decisions can be assessed."[66]

Marshall also lists six general requirements for accountability in appraisal documentation. Multiple-level documentation begins with program level documentation, which would be addressed by meeting her institutional accountability requirement discussed above, but also includes separate records disposition documentation for administrative and operational records The disposition of McKee Archives' records will be discussed in more detail later in this chapter. The second and third general requirements Marshall notes are that appraisal documentation needs to evolve to reflect changes in the appraisal practices of the institution and that the level of documentation needs to be sustainable. The sustainability of the documentation is of particular importance to small archives, such as the McKee Archives, where there are only 1.5 employees to cope with all archival functions. These resource limits are an important reason why the archives will require the support of the university before it can begin to

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[66]Ibid., 214.

implement an appraisal program. They will also probably have an impact on the type of documentation that the McKee Archives creates to document appraisal.

The last three general requirements Marshall discusses involve the audience and accessibility of appraisal documentation. Marshall argues that in order to be effective, appraisal documentation needs to meet the needs of all of the archives' stakeholders and be easily accessible and understandable to outside users. She posits that appraisal documentation could help agencies improve recordkeeping practices, help patrons better understand the collections they use, and assure society that appraisal decisions have been made responsibly.[67] Stakeholders for the McKee Archives, aside from staff, include Brandon University's Board of Governors, the Senate of Brandon University, patrons, including faculty members, students, alumni, academic and administrative departments, donors, and others. The first step toward making the McKee Archives' appraisal documentation accessible would be to mount the Appraisal Policy and an explanation of appraisal practices and documentation on the archives' website. The Appraisal Policy and relevant documentation could also be sent to the Senate Library Committee for input from the academic community, as well as the President's Advisory Group, which consists of heads of campus departments for which the Archives would be appraising records.

Making appraisal documentation accessible seems to be more problematic for archives than actually documenting appraisal decisions. Marshall reports that access to appraisal documentation at the National Archives of Australia is sometimes difficult,[68] while Craig discovered that 70% of the archives that participated in her survey responded that appraisal decisions were not recorded or reflected in finding aids, while 66.7%

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[67]Ibid., 210.
[68]This is due to the fact that government agencies generate the bulk of appraisal documentation rather than the Archives itself. For a full discussion, see Marshall: 143-179.

"indicated that the general public does not have access to appraisal documents and decisions, especially to documents that have no status in a separate series but are incorporated in the institution's other official records"[69] Many of those who responded that access would be possible, reported that individuals would have to formally request access through access to information legislation, for example.[70]

While the actual appraisal reports at the McKee Archives would be subject to Manitoba's *Freedom of Information and Protection of Privacy Act* (FIPPA), I believe the existence of such appraisal reports could be noted in the finding aids of collections in the archives. This could be done through the "Finding Aid" field in the database, with, for example, a note that states: "An appraisal report exists for this collection. Please contact the University Archivist for access." Currently, the archivist responsible for each description records his or her name in the General Notes field, but based on an argument made by Terry Cook,[71] I would like to see the curriculum vitae for every archivist who works for the McKee Archives kept on file and made available to users on request. The existence of such documents could be noted on the archives' website where the appraisal theory and methodology used by the Archives is explained.[72]

In deciding on what type of appraisal documentation would work best at the McKee Archives, I considered examples from Library and Archives Canada, the Provincial Archives of Alberta (PAA), Archives of Ontario, the City of Toronto Archives

[69]Craig, "Doing Archival Appraisal in Canada:" 24.
[70]Ibid.
[71]See Terry Cook, "Fashionable Nonsense or Professional Rebirth: Postmodernism and the Practice of Archives" *Archivaria* 51(Spring 2001): 34.
[72]As the McKee Archives does not yet have an appraisal strategy, this section of the website does not exist. However, once a strategy available, the archives' website should include a page explaining the archives' approach to appraisal, including access to relevant policies. The existence of each archivists' curriculum vitae could then also be noted on the page.

and the City of Regina Archives.[73] The goal was not only to determine the kind of appraisal documentation that would suit the McKee Archives now, but also to consider possibilities for ideal appraisal documentation.

The Appraisal Report in macroappraisal, as prepared at Library and Archives Canada, has a number of standard components. The introduction of the report provides contextual information for the submission, authority and record-keeping of the records being appraised. As practised at Library and Archives Canada, the purpose of the Context of Submission section is to explain the circumstances that led to the Records Disposition Submission (RDS) by the agency and how the Archives is responding to it and why. Through this section of the report the archivist also links the RDA, the Appraisal Report, the Terms and Conditions attached to the appraisal and the resulting Records Disposition Authority (RDA).[74] Context of Authority outlines the records disposition history of the RDA in question, while the Context of Record-Keeping looks at the state of record-keeping in the institution under examination.[75]

The Appraisal section of the report begins with the Appraisal Thesis, in which "archivists are asked to summarize the main elements of the arguments supporting their appraisal decisions and recommendations" which are then discussed in more detail in following sections of the report. Through the appraisal thesis the archivist establishes the "foundation for the intellectual audit trail" for the appraisal.[76] The remainder of the Appraisal Report deals with research, analysis, technical evaluation, records disposition

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[73]Examples of appraisal documentation were provided by respondents to the survey and used as the basis of Chapter 3 of this thesis. Although I was provided with examples, many of the archives contacted requested that I only analyse the structure of their forms, not the content. In accordance with their wishes, the actual forms have not been included as part of this thesis.
[74]Richard Brown with Yvette Hackett and Marc Cockburn, *Drafting an Appraisal Report for the Disposition of Government Records*, (National Archives of Canada Government Records Branch, 2001): 5.
[75]Ibid., 6-7.
[76]Ibid., 8.

decision-making involved, and acquisition and preservation recommendations,[77] which effectively test the appraisal thesis, ultimately confirming it or providing the evidence for why the original thesis needs to be modified. Ideally all records in all media are examined at the same time in logical order. Appraisal reports at Library and Archives Canada are set at twenty pages and require signatures from the appraisal archivist, a reviewer, and the recommending archivist.[78]

The documentation provided by PAA is a combined acquisition approval and archival appraisal form for private records, and serves as the basis for my recommendation for the McKee Archives' private records appraisals. It includes sections for: contact archivist, donation under consideration, extent, background/provenance information; access conditions; and use conditions. It also has a section called Rationale to Acquire/Appraise, in which the archivist lists potential records for selection and potential records for destruction/return and provides the rationale for both lists. PAA's documentation also has an attached preservation worksheet. The completed form includes signatures from the appraisal archivist, the Manager of Private Records, and the Provincial Archivist. The form also records recommendations from the Acquisition Approval Committee.

Joseph Solovitch from the Archives of Ontario provided documentation for both institutional and private records. Most records acquired by the Archives of Ontario are identified and transferred through records scheduling. An Archives Disposition Form is prepared for each schedule that is appraised, "ensuring that the rationale for

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[77]Ibid., 3.
[78]Based on the Appraisal Report written by Kerry Badgley for the administrative and operational records of the National Archives of Canada [no date]. The appraisal report was sent with personal correspondence. Caryn St. Amand to Christy Henry, February 27, 2004.

retention/destruction is thoroughly documented on the form and taking into account any relevant functional analyses which may have been prepared."[79] The Archives Disposition form records the schedule and series number, as well as the ministry/agency and branch being considered. It has sections for the functional analysis, the schedule overview and appraisal recommendations and rationale. The form is then subjected to peer review. The Private Records Assessment Report also has a section for recommendations and rationale; the body of the report records standard accession information about the collection in question such as donor information, custodial history, dates, extent, history/biographical information, access restrictions and notes for finding aids, associated material, related material and physical condition. It is also peer reviewed. Both forms used by the Archives of Ontario leave space to outline the comments given by the peer reviewers.

The appraisal report provided by the City of Toronto Archives was the most traditional.[80] The report included fields for: subject of the appraisal; background information on the appraisal; extent; dates; administrative history; custodial history and scope and content. The findings of the appraisal were expressed using the following criteria: evidential and informational value; relationship of the appraisal to the City of Toronto Archives Acquisition Policy; related and associated records; restrictions; physical condition; cost considerations; accruals; and creator-generated finding aids. The decision to acquire (or not) was then recorded, however there does not seem to be a specific area to record the appraisal rationale. Once completed the appraisal report is reviewed by two peer reviewers and a supervisor before being approved by the City Archivist and the Director, Records and Information Management. The appraisal report is the only

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[79]Solovitch to Henry, September 16, 2008.
[80]The City of Toronto Archives appraisal report greatly resembled the "microappraisal" step of macroappraisal.

documentation received that also includes a separate document outlining the criteria the archives uses when appraising records.

Sections of the City of Regina Archives appraisal documentation were quite different from the other documentation examples received. The report includes sections for: background information on the records in question; a section to list the content of the materials being appraised; issues arising from the appraisal; appraisal of material; options for the materials (listing pros and cons for each option); and recommendations. Although the options section was an interesting addition, the recommendations did not make clear which option was ultimately selected. In addition, the appraisal of material section did not specifically mention the rationale for decisions. There was no signature section for the City of Regina appraisal report.

Until such time as a records management system is developed for Brandon University, I suspect that the McKee Archives will postpone adopting an appraisal strategy for institutional records. Ideally I would like to see the archives implement macroappraisal, however I have two concerns. The first concern is whether the archives can sustain the level of documentation required by macroappraisal. The McKee Archives' resources are limited. The benefits of macroappraisal will need to be weighed against the reality of the Brandon University situation. The second concern, based on Marshall's accountability requirements, is how understandable macroappraisal documentation would be to the average archives user or university community member. Obviously until macroappraisal documentation is created it will be difficult to address this concern directly.

Given the still early stage of development of the McKee Archives, I anticipate that it may ultimately adopt appraisal documentation based on the Archives of Ontario's Archival Disposition form. The form summarizes the relevant functional analysis and records both recommendations and rationale for disposition decisions, however it is more concise than the macroappraisal Appraisal Report. This level of documentation would be easier for a small archives with still limited resources to sustain, without sacrificing transparency or accountability when it comes to appraisal decisions. Furthermore, it is based on functional analysis, one of the macroappraisal components I strongly advocate for Brandon University, and the relevant functional analyses could be made available if researchers requested it.

In the interim, until a records management system is established and documentation like that used in macroappraisal at the LAC or at the Archives of Ontario can be implemented, I would like to see the McKee Archives separate its processing form from its appraisal documentation, and adopt a separate appraisal report. For the time being the same report could be used for both institutional and private records, which while far from ideal for institutional records is still better than no documentation at all. My preference would be to adopt a form like the one used by PAA rather than the City of Toronto Archives as I prefer the separate section for recommendations and rationale, and the existing processing form at the McKee Archives already covers a number of the sections in the City of Toronto report. I also like the attached preservation worksheet, as that is an area of archival work that the McKee Archives has documented poorly. The advantage of adopting appraisal documentation now is that by the time records management is implemented the archives will have some past appraisal documentation

practices to draw upon and learn from as they move forward into the appraisal of institutional records.

An additional complication for appraisal documentation at the McKee Archives centres on the issue of review and approval for appraisal decisions. The majority of the appraisal documentation examples discussed above utilize either peer reviewers or a committee to evaluate appraisal decisions. The McKee Archives employs only one part-time archivist who is not the University Archivist, which makes the peer review system problematic. A more likely scenario for the McKee Archives would be the committee format; however it is probable that there would be separate committees for private and institutional records. The most plausible committee for private records would either be the existing Senate Library Committee, of which the University Archivist is a member, or a working committee of the Senate Library Committee. Appraisal decisions for institutional records would be overseen by an administrative committee that could include the University Archivist, the Vice-President (Administration & Finance) and the Vice-President (Academic & Research).[81]

The purpose of records management is to provide for an organization's business needs, while also addressing accountability issues and community expectations, through the controlled creation, maintenance, storage and disposition of all of an organization's records in an efficient and cost-effective manner. The design, creation, and use of records to document appraisal is one key aspect of records management in an archives. The proper control of such records in a file classification system is another key feature of sound records management. Like other organizations, archives are obliged to address these records management objectives. Unfortunately, it is too often the case that archival

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[81]Conversation with Tom Mitchell, University Archivist, S.J. McKee Archives on December 5, 2008.

institutions, while paying close attention to the records generated by other organizations, fail to address the vital need to create and maintain a records management system to control the documentation of their own functions and activities. This failure has important implications for the accountability and transparency of decisions made by archivists related to archival work. There is no accountability if records management is weak in an archival institution.

The following proposed records management system for the records of the McKee Archives is limited to operational records.[82] The decision to omit more routine administrative records from the system is based on two considerations. The first consideration is the probability that the administrative records of the archives would be scheduled with other campus departmental administrative records. The second consideration is that the majority of the records that document archival work are the result of the functions that are unique to the archives, therefore operational records are the most likely site of records for inclusion in an accountable and transparent archives of archives.

The system I would propose for the McKee Archives is based on file classification systems used by Queen's University Archives and the City of Vancouver Archives. Within this system I would place the McKee Archives under Support Services for Brandon University, along with departments such as the Library. As this is a hypothetical system, Support Services would be the first function (1000) with the

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[82] Records management systems are usually divided into two components – administrative and operational records. Administrative records are those records that are common to all offices in a given organization. They document housekeeping functions, such as personnel and finance management, and relate to agreements, contracts, meetings, legal actions and so on. Operational records relate to specific operations and services provided by particular departments or divisions in the process of carrying out their assigned functions. They are distinct from administrative records and unique to each department.

archives as the first primary (1100). I would then divide the operational activities of the McKee Archives into four secondaries, including: planning and review, collections maintenance; public services; and outreach.

Planning and Review (1100) would contain records dealing with the planning and administration of services provided by the Archives to members of the university community, as well as the public. For the McKee Archives, I believe the majority of these records would be generated by the University Archivist. Types of records under this heading could include: project development files, correspondence between the University Archivist and University Librarian[83] regarding archives' administration, and correspondence with the Institutional Advancement Office regarding funding of projects in the archives. Archival policies would also be included in this secondary classification. Files would be created for each policy, project or funding matter. For example, the acquisition policy file would be "1100.10.01 Acquisition Policy."

Collections maintenance (1110) is concerned with the maintenance and organization of holdings of the McKee Archives. Archival functions that would fall under this secondary classification include appraisal, arrangement/description and conservation/preservation. Accession would also be dealt with here. Documents generated by the archives that would fall under collections maintenance would include accession records, appraisal documentation (either an appraisal report or the processing form currently used by the archives), finding aids, deaccession records, the archives' database, which handles both accession records and descriptions, as well as any related correspondence, inventories and so on. Most accession, appraisal,

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[83]The University Archivist at Brandon University reports directly to the University Librarian. The University Librarian has final say on budget and administrative decisions that relate to staffing, space, capital investments or significant new initiatives in the archives.

arrangement/description, conservation/preservation and deaccession files would be named after the fonds or collection in question and would use that fonds/collection's accession number. For example, the file containing the signed accession record for the Alf Fowler collection would be "1110.10.6-1999 Alf Fowler collection." The description records for the Alf Fowler collection would be "1100.30.6-1999."

The Public Service (1120) secondary would include records documenting the McKee Archives' research services. The McKee Archives does not generate a lot of records dealing with this function as it does not have a reference desk with scheduled reference staff or any kind of retrieval forms; however it does generate researcher forms, mail and email reference inquiries, telephone reference enquiries and the Reading Room sign-in book. The bulk of the documents would be correspondence and forms, with the files for researcher forms and reference inquiries being broken down by year.

Outreach (1130) is the last secondary I propose for the McKee Archives' records management system.[84] This category would consist of documents related to promotional activities and events, as well as exhibits. I would divide Outreach into exhibit case files and special event case files; documents could include correspondence, administrative notes, catering information, work orders for exhibit installation, and exhibit descriptions. Again, each exhibit or special event would generate its own file. For example, the "*tran*slate" exhibit mounted by the McKee Archives in collaboration with Brandon artist Barb Flemington in December 2008 would generate both an exhibit file (including

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[84]At the time when this thesis was written the McKee Archives was not creating any records that can be labeled acquisition records. The majority of the acquisition work done by archives staff is either documented in the accession record or is conducted face-to-face or over the telephone and few, if any, records are created to document the calls. If at some point the archives does begin to create such documentation I would recommend a separate secondary classification (Acquisition of Archival Records) be added to the proposed system.

correspondence, a description of the exhibit and information on the archival materials chosen for the exhibit) and a special event file for the exhibition reception. If "*tran*slate" was the fifth exhibition mounted by the Archives, the exhibit file would be "1130.10.05 *tran*slate Exhibit." The reception file would be "1130.20.05 *tran*slate Exhibit Reception."

Although the documentation of archival functions is mentioned in the literature, very little is said about what that documentation should look like or how it should be maintained by archives. Yet, if archives want to fulfill their social obligations and be able to justify their decisions then archivists need to conduct their work in a transparent manner. Records systems and policies need to be designed to allow for the creation and maintenance of records that document archival actions, especially appraisal. Furthermore, that documentation needs to be made available to archival stakeholders in language that is accessible. The McKee Archives is just one example of a Canadian archives that has done a poor job of documenting appraisal in the past. While it is not presently in the best position to create ideal appraisal documentation it does have the means to improve on its past practice.

CONCLUSION

Preservation of the public trust is a primary goal of accountability. To achieve that goal, an organization must "account ... to its constituencies by pursuing its stated mission in good faith and with defensible management and governance practices."[1] In democratic societies, the management of governments, especially, is "carried out in the name of the people and in and by the law the people sets through its democratic institutions."[2] Upholding the public trust now requires that governments and other institutions be held accountable through records they create, manage, and archive.

These community expectations have implications for archives. As those who have a profound effect on the recorded evidence available to society, archivists have an ethical responsibility, in addition to any legal obligations, to make their decisions and actions transparent and accessible to the public.[3] The societal risks of recordkeeping accountability failures by archives and other institutions are extreme: "impairment of [the] functioning of society and its institutions; loss of evidence of the rights of people as citizens and clients; inability of societal watchdogs to call to account governments, corporations and individuals; loss of collective, corporate and personal identity; loss of individual, corporate and collective memory; [and the] inability to authenticate and source mission critical information."[4]

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[1]Kevin P. Kearns, *Managing for Accountability: Preserving the Public Trust in Public and Nonprofit Organizations* (San Francisco: Jossey-Bass Publishers, 1996): 40.

[2]Sue McKemmish and Frank Upward, eds., *Archival Documents: Providing Accountability Through Recordkeeping* (Melbourne: Ancora Press, 1993): 36.

[3]The Association of Canadian Archivists' *Archivist's Code of Ethics* (available at: http://archivists.ca/about/ethics.aspx) specifically mentions the duty to document appraisal, selection and acquisition criteria, all actions that may alter records in the course of preservation, and all decisions and actions taken with regard to deaccessioning.

[4]Sue McKemmish and Glenda Acland, "Archivists at Risk: Accountability and the Role of the Professional Society:" 5. Available at: http://www.sims.monash.edu.au/research/rcrg/publications/archive1.html (Accessed: June 16, 2007).

Like other institutions, archives cannot be held to account without creating, maintaining, and making available over time as archives of archives, records that document their work. Canadian archives traditionally have not done so very well. While existing accountability mechanisms, such as laws, formal audits, royal commissions, codes of ethics, and media scrutiny are helpful in holding archives to account, they are not enough. Good records are needed to make them effective. Documentation of archival work needs to be a higher priority in archival institutions. While necessary for all archival functions, documentation is particularly important for appraisal because archivists are literally 'co-creating history' through their keep/destroy decisions. The archival literature falls short here in providing practical advice and examples. It focuses more on appraisal theory, which while vital, is not enough. Although appraisal theorists now advocate better documentation of appraisal, appraisal practice still needs to be better documented, and the records made more understandable and accessible to all archival stakeholders if archives to meet accountability requirements for appraisal.

The S.J. McKee Archives (Brandon University) case study in this thesis examines appraisal practice and documentation at one small Canadian archives. The McKee Archives has not done a good job of documenting appraisal in the past, and does not have sufficient resources to create and maintain ideal documentation for appraisal of institutional records. Nevertheless, it can do better. The McKee Archives, like all archives, can take some steps to begin this task. It will only move significantly in this direction when its parent institution decides that its archival accountability is important enough to support with appropriate resources. Archivists have a key role to play in

advocating for those resources. This thesis is intended as a contribution to that discussion.

APPENDIX A

March 21, 2003

To Whom It May Concern:

My name is Christy Henry. I am currently enrolled in the University of Manitoba's Masters Program in Archival Studies. As part of the requirements for that degree program I am writing my thesis on the archives of archives. For my research I am trying to gather information from major archives across the country which will help me to determine how well archives document and archive their own decisions and actions in the process of doing archival work. I am interested in knowing what documents archives are creating and maintaining when performing appraisal, arrangement, description, reference, public programming, and conservation activities. I want to use this information to study the role that archives play in shaping their holdings and programs and the ways in which archives can explain or account for these actions.

To begin my research, I would like to know more about the nature and quality of older archives of archives, rather than current records. Would you send me the publicly available fonds or other descriptions of the holdings of your archives' own archival records -- that is, descriptions of the records created by your archives to administer your archival program. I would also appreciate receiving any publicly available descriptions of private records of archivists that your archives may hold, as these too will throw light on my research topic. If these descriptions are available at a Web site, would you indicate the URL.

Descriptions, replies or questions can be emailed to me at cmorganhenry@hotmail.com or faxed to Christy Henry, c/o Tom Nesmith at (204) 474-7590.

I would greatly appreciate any of the above information (or related information you think relevant) that you can provide me at your earliest convenience. I would also like to know whether you might be interested in responding to follow-up questions I may have as I develop my research project. Thank you very much for your time.

Sincerely,

Christy M. Henry

September 5, 2008

Hello,

My name is Christy Henry and I am currently working on my thesis for the University of Manitoba's Masters Program in Archival Studies. For my research I am trying to gather information from major archives across the country to determine how well archives document and archive their own decisions and actions in the process of doing archival work. While I am interested in knowing what documents archives are creating and maintaining when performing appraisal, arrangement, description, reference, public programming and conservation activities, the thesis will focus on the appraisal function. I want to use this information to study the role that archives play in shaping their holdings and programs and the ways in which archives can explain or account for these actions.

Would you please send me the publicly available fonds or other descriptions of the holdings of your archives' own archival records – that is, descriptions of the records created by your archives to administer your archival program. I would also appreciate receiving any publicly available descriptions of private records of archivists that your archives may hold, as these too will throw light on my research topic. If these descriptions are available at a web site, would you please indicate the URL.

Regarding appraisal, I would appreciate it if you would be willing to share with me the types of records you use to document appraisal decisions. If possible, could you please send me examples of those records. Blank forms are fine if you have concerns about the access/privacy issues of completed appraisal documents.

In addition to the types of records created by archives, I am also interested in how archives manage their own records – i.e. how the records of the archives itself fit into the overall records management system that governs the archives. To that end, could you share with me the file classification system you use for current records management of your current records. If the overall file system's structure is available online, could you please provide the URL for that as well.

I would greatly appreciate any of the above information (or related information you think relevant) that you can provide me at your earliest convenience. Descriptions, replies or questions can be emailed to me at henryc@brandonu.ca. Thank you very much for your time.

Sincerely,
Christy M. Henry

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