



RECORDKEEPING INNOVATION

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Mr David Tune AO PSM
Independent Reviewer
c/- Tune Review Secretariat
National Archives of Australia
Queen Victoria Terrace
Parkes ACT 2600
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30 June 2019

Dear Mr Tune,

Thank you for the opportunity to make a submission to the current Functional and Efficiency Review of the National Archives of Australia.

Please find, in the following pages, our submission for consideration by the Review.

Yours sincerely

Barbara Reed

Barbara Reed
Director

About Recordkeeping Innovation

Recordkeeping Innovation is a consulting firm specialising in records, archives and information management. We work across multiple jurisdictions within Australia and in the Asia-Pacific Region. Our services involve defining information governance frameworks, recordkeeping by design, design of key records control tools such as metadata, information structures and records retention rules. We assist organisations, private, public sector and NGOs, to identify compliance requirements, to establish systems to manage digital records and information assets and to enable retention of records beyond the system that created them.

Our submission focusses **on section 2e of the Terms of Reference: The feasibility and efficiency of alternative approaches to fulfil its outcomes and functions, including identifying the benefits, costs, risks and any other relevant considerations**

Australia needs a dynamic National Archives. The basis for such a national institution are there. Over the past 3 decades, Australia has consistently punched above its weight in identifying methods of managing digital resources in the transitional period between paper and digital. National Archives has been proactive in this space, through collaborations with University led research, international cooperation and involvement in establishing international and national standards. Each of these endeavours adds significantly to capacity and capability within the institution and in the profession more broadly. But these activities are amongst those that can be regarded as ancillary to the main activities of the organisation and therefore subject to cut backs or minimisation in times of straitened finances. We argue that, on the contrary, such activities are core to the institution being able to flourish into the digital age. It is critical to work with emerging technologies, to identify new ways of fulfilling the mandate of the institution, both in ensuring regulation of recordkeeping in diverse technical environments and in meeting public research needs of the future. Current examples of initiatives which have garnered significant positive national and international attention to the Archives are the collaboration with the Australian Strategic Policy Institute, with the secondment of Anne Lyons and the production of 'Identity of a nation' to great acclaim, and involvement in the innovative 'Archangel' project¹ investigating the use of Blockchain to prove authenticity of archives. Such initiatives should be multiplied and strongly supported by funding.

Digital systems in government are a potential risk to the record of the C21. The products and guidance issued by NAA are sound, but difficult to implement in agencies. The technology in operation is often anathematical to sustainable records of transactions. Government agencies are prepared to meet their compliance obligations, but trying to retrofit technology not designed for this purpose is almost impossible. National Archives needs to be more involved in devising practical, implementable techniques to ensure good recordkeeping in agencies. The identification and ongoing management of legacy (or abandoned) business

¹ Archangel, Trusted Digital Archives <http://www.archangel.ac.uk/>, and <https://www.youtube.com/watch?v=xKCdKo6rQXw&feature=youtu.be> where National Archives of Australia is one of the partner repositories involved in a global distributed network maintaining archival records (UK, US, Norway, Estonia and Australia)

systems containing records of national significance is a current gaping hole in the archival practice. The paper models of time elapsed transfer will not work for digital records. New methods of compliance are needed. The leadership of National Archives knows this, and we commend initiatives such as the BRII Challenge: Automating complex determinations for Australian Government Information². But the Archives itself needs further funding to proactively conduct such research collaboratively with interested parties.

National Archives internal systems are aging and in need of replacement. This is a significant factor in enabling the institution to continue to serve its government and broader public constituents. However, this is a complex task. Previous off the shelf systems have been unable to meet the business requirements of an archive, and National Archives was at the forefront of developing systems to meet these needs. But bespoke, internally-developed systems are unlikely to be viable in meeting the future requirements on non-custodial management, multiple technological environments and increasingly digital research needs. In addition, National Archives needs better infrastructure to accept custody of digital records when this is appropriate. Digital preservation requirements and storage of digital information must be resourced and managed into the future.

As a regulator of government recordkeeping, National Archives products and guidance are well respected and of considerable operational value to the broader public sector. While arguably better positioned in these developments than some of their state and territory based peers, a significant and continuing body of work is still needed to translate the tools into implementation realities. If the post custodial reality is that National Archives will not (always) be the holder of key government digital records, more attention is needed to monitoring their creation and maintenance in a distributed network.

Looking internally, many of the National Archives own business practices reflect slow moving and overly prescriptive approvals. While significantly improved over the last 5 years, the process for the development and approval of disposal authorisations is onerous, too long and too prescriptive to little end. Originally following an industry developed methodology (DIRKS) the implementation of that methodology within NAA turned overly prescriptive and full of hurdles creating barriers. The potential of collecting information that would allow the non-custodial management records held by agencies, and the notion of the information provided being fed into NAA's internal systems as a mechanism for proactively documenting government, was never realised. This leaves an overly prescriptive process providing huge amounts of information that are not effectively utilised for ongoing management of the archival record.

The current system of access reviews, requiring manual processes to examine individual records prior to release for public use, is unsustainable in the digital age. Initiatives such as the research of Graham McDonald³ into technology-assisted sensitivity review to apply artificial intelligence and machine learning techniques to identifying records that contain sensitive information needing longer term protection should be pursued to automate these

² <https://www.youtube.com/watch?v=JeMp2OI5Y1c&feature=youtu.be>

³ Graham McDonald (2019) A framework for technology-assisted sensitivity review: using sensitivity classification to prioritise documents for review. PhD thesis University of Glasgow <http://theses.gla.ac.uk/41076/>

processes that are currently time consuming and putting barriers in place of automatic release.

Other initiatives might also be pursued to enable the public to access information. This only needs application of imagination and, of course, funding to sustain such initiatives. One minor example might be the harvesting of the lists of records which every agency is required to public – the Harradine report. These could be incorporated within the Archives system and thus made more available, even though those records would still need to be accessed via the originating agency. Connecting the public with records not yet (or potentially not ever) in the custody of the National Archives is desirable to knit together currently fragmented frameworks for access to public records.

National Archives is currently, and over much of its history, has been isolated from the broader profession. One of its mandated roles is as a leader to the professional community. This is not always effectively undertaken by asserting that National Archives defines best practice and the remainder of the community mutely follows. There is not a huge amount of collaboration with the broader industry – computing, recordkeeping or historical – in providing this leadership. Individual initiatives are undertaken, but these largely remain unconnected and not crafted into a strategic approach for the organisation. A small example can be found with fabulous initiatives in the digital humanities area, with innovative interfaces to the holdings provided by projects such as Dr Michael Whitelaw's 'The Visible Archive'⁴ (now 10 years old) or the analytic projects of Dr Tim Sherratt on mapping patterns of access decision-making and release⁵. Such initiatives are great, but they tend to be one off, driven by creative individuals and not brought into the ongoing mechanisms supporting exploration of the hugely valuable online resources of NAA – either as public interfaces or to support internal functions. More of this type of work is needed, and should be an integral, funded, part of the NAAs mandate.

Through its recognition of creative mechanisms to confront Australia's documentary record relating to Indigenous Australians⁶, and the appointment of some (not enough) Indigenous staff, the Archives created an environment of innovative ways to serve multiple communities. More needs to be done to proactively manage collaboratively based projects for Australia's indigenous population. Many of the existing initiatives have not been extended nor filtered through all the practices of the institution. Such initiatives form the potential basis to transform relationships to the broader Australian community, and a springboard to focus on diverse community needs. Being able to generalise from specific initiatives into broader professional practice is a further example of strategically capitalising on what are currently siloed individual initiatives. Extending such initiatives to other communities with current and ongoing special needs for records potentially provides a mechanism to revitalised practice for people-centric systems.

⁴ Mitchell Whitelaw, The Visible Archive, July 2009 <http://mtchl.net/the-visible-archive/>

⁵ For example, 'The Badge of the Outsider': Open Access and Closed Boundaries, November 2017 <http://discontents.com.au/the-badge-of-the-outsider-open-access-and-closed-boundaries/>

⁶ The Memoranda of Understanding for access to open period Commonwealth records. <http://www.naa.gov.au/collection/fact-sheets/fs114.aspx>

The National Archives is a hugely valued part of our archival infrastructure that defines Australian identity and evidence of past actions that constitute Australia. It has a vital role to play in the twenty-first century digital environment, but it cannot hope to attain this potential if subject to continual cuts and funding stress. The potential of the institution is vast and vibrant on so many fronts. But the potential is being ignored, restricted and constrained. What was once a world leading, innovative institution demonstrating creative capability, is now threatened by lack of resources of dropping into an institution forced into a passive role focussing only on promoting the records in its custody. This would be an appalling waste and a significant loss for the public sector generally, and the Australian community into the future.