

Mr David Tune
Independent Reviewer
c/o Tune Review Secretariat
National Archives of Australia#
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SUBMISSION TO THE TUNE REVIEW

Dear Mr Tune

Thank you for the opportunity to make a submission to the Review into the National Archives of Australia (NAA).

The NAA is Australia's leading archival institution and a world leader in digital archival and information management, policy and advice. It plays a critical role in the accountability and transparency of the Australian government and identifies, collects and preserves its most important and valuable data. The preservation of Australia's historical record has always been important, but the digitization of these records has created both opportunities to improve the accessibility of this invaluable record with the Australian people and also created new threats, some with serious consequences. As archival work moves from a focus on the preservation of physical records to digital records, the security, integrity and availability of these records, that are fundamental to our democracy and democratic processes, becomes an issue of critical national significance.

The resource implications of moving towards a digital model of archiving have not been addressed. This submission will focus on two major challenges posed by the long-term underfunding of the NAA: to national security and public accessibility of the nation's history.

National Security

The NAA is responsible for archiving the most valuable Australian Government records – both classified and unclassified - and is the principal information policy and standard setter, and the ultimate authority on what information must be kept, and what government information can be destroyed.

Logically, the shift to digital archiving will eventually see the NAA develop a real-time digital archiving ability. However, as more of the nation's history and classified records are stored digitally, securing that data and ensuring its integrity and availability will be increasingly critical. Once all government records that meet archival standards are archived in real-time, the NAA will become the most important single source of classified and unclassified government records, creating a highly attractive target for adversaries seeking to engage in either espionage, or disruption (for example, through selective leaks of government secrets). Russian government interference in the 2016 US Presidential election and similar efforts since in the United States and elsewhere highlight some of the many ways sensitive information can be misused to undermine trust in democracy and democratic institutions. It takes little effort to imagine various scenarios in which records held by the NAA, such as Cabinet documents, could

be exploited by malicious actors were they to gain unauthorised access. Even though the risk to the NAA from cyber intrusions is widely apparent, there has been no concomitant increase in resources to ensure its holdings are adequately protected.

Even without real-time archiving, the NAA possesses enormously valuable digital holdings that could be accessed and misused via a cyber intrusion. Failure to fund the protection of these holdings is creating a growing and increasingly serious risk.

A recent International Cyber Policy Centre report by visiting archival fellow Anne Lyons has identified the vulnerability of the NAA and other state archival holdings as a latent national security issue. As Lyons points out, Australia's archival holdings could be used by our adversaries as part of a hybrid warfare strategy: by destroying the integrity of essential datasets like migration records or dealing a devastating psychological blow to the nation through the destruction of large parts of our history.

The report calls for urgent action to improve the NAA's digital security and preservation. Lyons argues this needs to be considered as part of Australia's critical infrastructure framework, and national security agencies need to work with the NAA to identify and help provide solutions for its ongoing digital preservation, security and access.

Our national identity assets are the evidence of who we are as a nation—our resources, our people, our culture, our way of life, our land, our freedom, our democracy. What if we had no evidence of who we are, what we own, who governs us, where we have come from?

- Anne Lyons, *Identity of a Nation*, 2018¹

Public accessibility of the nation's history

While the NAA's primary mission must be to store and secure the nation's most essential records, this makes no sense unless the records are also accessible and retrievable.² Indeed, the two are inextricably linked in its mission statement: "To connect Australians with their identity and history through our stewardship of Australian Government records."

Australia is currently failing on three fronts in this regard.

First, as more and more government records are stored in digital form, dedicated resources are needed to ensure the data is maintained in a format that enables its continual retrieval and that it is stored in a manner that enables easy retrieval. It would seem the NAA has not been resourced to perform this function.

Second, as paper and analogue records deteriorate they require transition to digital formats to ensure they can be preserved. Again, the NAA appears to lack resourcing to perform this elemental function.

Finally, by design the NAA is mandated to collect the Australian government's most important records. The records that tell the story of the nation. It seems remiss of government to use

¹ 'Identify of a Nation, protecting the digital evidence of who we are', ASPI, December 2018, <https://www.aspi.org.au/report/identity-nation>

² Pending the expiry of any classification periods.

taxpayer funds to store these essential documents and then by virtue of underfunding make them available only to a few. In fact, the NAA's holdings are the inheritance of the Australian people and should be accessible to all.

Foreign archival institutions, like the National Archives in Washington D.C. that make archival documents accessible to the people whose history they tell, reveal the level of public interest in these priceless holdings. At a time when the breakdown of traditional media structures and institutions is fragmenting society and truth is being contested, Australia would be well served by a permanent public building capable of showcasing the richness of Australian history and making source documents accessible to all.

Conclusion

Long-term underfunding of the NAA is steadily building up significant risk that could be readily exploited by our adversaries while also depriving the Australian people of access to their history.

The Australian government should invest the resources needed to allow the NAA to preserve the Australian government's most essential records and ensure these can be protected from exploitation by our adversaries. The NAA should also be resourced to make its holdings accessible to the Australian people via a dedicated institution that makes Australia's history available to all Australians.

Disclosure: The NAA is a supporter of ASPI where the author works.