RIMPA

16th June 2019

Mr David Tune

Independent Reviewer

National Archives of Australia,

Parkes, ACT, 2600

E: review@naa.gov.au

Dear David,

Re: NAA Review Submission

As a valuable stakeholder in the records and information management industry we are pleased to submit the following submission based on the criteria provided.

Should you have any enquiries or wish to seek further clarification please do not hesitate to contact myself.

Thank you again for the opportunity to provide feedback.

Yours sincerely,

Anne Cornish MRIM

General Manager

RIMPA

RIMPA SUBMISSION – NAA Tune Review – June 2019

1 Comment on the functions performed by NAA when undertakings its role. (focus on those functions it should cease, continue, transfer or commence)

Over the past few years NAA has been recognised as a leader in promoting the 'Digital Information Direction' for Australia i.e. Digital Continuity 2020 Policy.

RIMPA as Australasia's peak body for Records and Information Management Professionals fully supports NAA's 3 key principles:

- Information is valued
- Information is managed digitally
- Information is interoperable

RIMPA as a consensus do not believe any of the functions of NAA should cease as there are clear dependencies between the outcomes.

- Develops records management policies and standards for the Australian Government
- Provides records management advice, guidance and training to agencies
- Authorises the retention and destruction of Commonwealth records by issuing records authorities
- Stores, protects and makes accessible records of enduring significance which are identified as archival resources of the Commonwealth and selected for retention as national archives.

Observations and consultation identified that due to resource constraints, NAA may be hamstrung to effectively perform all the functions required to preserve the nation's history and vital records in custody.

The ongoing preservation of valuable records through the digitising program does not appear to be scratching the surface of the work that needs to be done for agencies.

Members further identified there appears to be a major issue of capturing digital information of high value in government agencies which in our view is not being fully addressed, once again through resource restraints and inadequate support by government.

NAA has made significant progress in raising awareness of good recordkeeping in Australian Government Agencies through the Digital Transition Policy and Digital Continuity 2020 Policy and supported by the annual surveys Check Up -Plus etc. This has translated to some success in addressing some of the issues, such as the reduction of paper record holding in agencies but there is still a lot of work that needs to be done.

Member's general comments included:

- NAA should spend time understanding the reality of the environment that we're in, with an emphasis on priority and in future activities. It will be important for NAA should they undertake such a large digitisation focus, to investigate the ability for the data captured from this process to allow for a more user focused environment (self-service for information) capability. Do not see the purpose in simply digitising everything for a singular focus.

- As services to the public and corporate, NAA should continue to be seen as the directors of this crucial information. There is still an emphasis for capturing and retaining information either for substantial periods of time or permanently. With the continued amount of information being captured, this in years to come will become unmanageable.

- If NAA transferred the records management policies, standards, advice, training and RDAs to alternate entity elsewhere the NAA would need to work closely with that agency to ensure the policy direction would result in records that would be transferred to NAA were at a suitable level to be recognised and useable as archives. Continuing these functions in the agency is probably easier and better in terms of sustained influence and understanding of needs. Continuing those functions also means that the audit function (which is the assurance for the archive) lies squarely with the NAA and not outside their influence.

- Moving forward, it is felt that the need for digitisation will rely on NAA as organisations are typically generating digital records. However, the management of permanent physical records is still required.

- From a preservation perspective, there are two issues, the capturing of the physical and the ongoing digital management. We don't want to be in the same position 30 years down the track not able to manage the digital information being captured.

- NAA should be a service provider for the access to our Corporate and Australian Historical information however, a cost benefit analysis and strategy should be employed to ensure the value of the information can be accessed through more than just the digitisation.

2 Comment on the capability and resourcing of National Archives to efficiently and effectively fulfil its essential functions.

As mentioned above more resourcing is required for the preservation of the current paper holdings and the major challenge of dealing with the vast digital information holdings in government agencies, particularly unstructured digital information.

The examination backlog appears to be an issue, as the resourcing for policy and advice, acquisition and preservation appears to be adequate, the supply side (which includes examination and processing) appears lacking.

Is there an opportunity to adopt an auto release and audit method (based on known risks) for access to records (either in person or digitally)? For example, the NAA stats page shows that 'most records in the open access period are released without any exemptions (96.5%) 3% are released with some exempted materials and 0.5% are exempted'. Would NAA consider implementing a risk approach to auto approve the release or digitisation of records in the 96.5% at a class level when they are requested (or on a proactive approach for known demand trends) and audit a sample of those records?

Focus (and resources) can then be directed to examination of the remaining 3.5%. Looking at the newly opened records list there are some key record series that are in demand (for example, service records) that should readily be able to have auto release and audit applied either on demand or proactive release.

Members General Comments and Questions:

- The question is, is there a need for an applicant to have more than 1,000 requests at any one time. It is understood that the serious researchers need access to information but this doesn't look right. Are the requests really all unique or are some a repeat for access that was previously denied? Does there need to be a temporary constraint or limit per month

or researcher until the backlog is resolved or a "all decisions are final" type provision or time to stop repeat requests which will have the same outcome but tie up resources again?

- Is there a need for several of the roles in the org chart and why they couldn't be combined? For example, Corporate Governance, Information Governance could be merged or Information Governance and IT Security could be merged. Could Preservation and Construction and Property and Security also be combined? Is there really a need for 3 regional coordinators? Each of the states has a Director and parts of their role would be collection management and access and public engagement so why the need for the regional coordinator roles? What is the thought behind declassification sitting under access but collection operation and preservation sitting under collection management?

- Organisation charts appear to be top heavy with management roles. From the Annual reports I'm looking at the APS band 1-3 and 4-6 and the EL1-2. By far the greatest of their staff are in the APS 1-6 ranges which is what I'd expect. However, the EL to APS ratio is 1:2 which doesn't sound right. I realise the archive needs qualified staff but perhaps to improve the service level there needs to be more 'coal face' staff (APS levels) that are able to examine, open, digitise and reduce those wait times. Finally, in the last fin year the SES band went from 4 to 7; in their current financial situation I would hardly have thought this was responsible decision making.

- Based on the requirement to undertake this review, it's clear the resources (both human capital and budget) are lacking.

- NAA should be equipped with the tools, people and technology to undertake the services both to the Australian public and Australian businesses.

- From interactions with NAA from a corporate perspective, their ability to provide responses and information has always been quick and efficient. Are they possibly doing the best they can do, it's difficult to say without further analysis, however it's clear they need some assistance and power to challenge the old ways, implement radical innovations and improve the way Australia uses and values information.

3 Comment on the efficiency of spending by NAA and its budget position.

RIMPA is not able to provide a detailed response on this matter as it does not have a deep knowledge of the budget position and how it is allocated and spent. However, the overall view is that with the increasing challenges to manage the increasing amount of information and data being created adequate budget should be provided to adequately manage this growth. It appears the opposite is true with the National Archives having to deal with continuing budget cuts.

From information gathered it would appear the own income line for NAA dropped 50% last financial year. The reason for this is unknown but concerning for ongoing services to either remain and or improve.

	2017/18	2016/17	2015/15
Cost of services	83 522	89 601	74 918
Own income	7 668	14 178	11 751
Govt appropriation	63 819	71 023	58 297
Other comprehensive income (not sure what this is)	15 655	(12,568)	(9 005)
Total	**3 620**	**(16 968)**	**(13 875)**

4 Comment on any barriers such as resourcing, legislation or other that may be preventing NAA from fulfilling their core outcomes and functions.

Resourcing

It is our view there is inadequate resourcing for NAA to maintain its traditional functions, such as preservation of records and oversighting the orderly and legal disposal of records. There is also the large challenge of dealing with digital information and data being created and maintained by agencies. This is a major challenge which needs to be addressed to ensure critical and valuable information and data is not lost. It is RIMPA's view that more specialised resourcing is required in this space.

Powers

From a corporate perspective, there is no enforcement from NAA, there are reviews and checks etc. However, if organisations don't meet the requirements, many accept the risk and don't make changes. Most organisations are in information chaos without an ability to move forward, talking about reforms, from our perspective this should be a priority task, Digital 2020 is there as a stick for the corporate world, but not enforceable. Ensuring there is control around managing an organisations information now will assist its ongoing accessibility and management into the future.

In our view the Archives Act needs to be strengthened to provide the National Archives additional authority and a wider mandate to enforce standards and good practices of recordkeeping in agencies. The current Act focuses on archiving and the preservation of records with little clout for the National Archives to intervene in agencies which are managing records poorly so that our records can be protected.

Culture

IT culture is a barrier. In today's environment where virtually everything is digitally or IT driven the existing culture in IT groups within agencies is proving a barrier to achieve compliance to standards and practices set by the National Archives. Records/Information Managers are still struggling to get their voices heard. There are numerus cases where Records Managers have not been consulted when systems are implemented to manage records. This lack of consultation has often resulted in poor implementation and systems that are not fit for purpose. It also undermines the role of the Records Manager where IT considerations and influences take precedence.

The proliferation of system and databases which are uncontrolled are increasing at an alarming rate. IT culture, in the main, when designing system does not take in account the life cycle of information. There is usually no plan in place for the migration of the data/information from legacy systems and the end state of the information/data.

Lead Agency

Confusing roles of other agencies operating in this space is a barrier, such as the Department of Finance Digital Records Transformation Initiative and the work done by the Digital Transformation Agency on data management. It appears that more coordination is required and it not clear which agency is the lead agency in this space.

Revenue and Income

Given the service costs and income there clearly needs to be more focus in revenue creation which may mean more resourcing at the processing (APS stream) end. Given the current demands this could probably come through reducing the examination and digitising supply times and a clear priority given to digitising in line with known anniversaries, interests etc.

5 Comment on the feasibility and efficiencies of alternative approaches mentioned in question 3 such as benefits, costs, risks or any other considerations.

Risks

The National Archives considers the value of information and how it will benefit the Australian people over the long term. Agencies, even if they manage their information well, will only manage it to the extent of their business and legal requirements. The main risk in not managing information over the long term is that it which will result in historical amnesia and the identity of the Australian people.

Loss and misuse of information can result in people rights being compromised and agencies not being able to perform their business effectively and efficiently limiting them to meet their accountability obligations.

Benefits

The benefits of having an effective recordkeeping regime is well known with improved searching and dealing with authentic records are well known. That is, reduced searching time, working from factual records with confidence, improved decision making, maintaining a good reputation.

Efficiencies

Leveraging researcher's interest and digitisation activities to populate the NAA resources:

- Crowdsource – need to strategically place scanning stations for public use;
- Can researchers donate images in an appropriate format or do the digitising for you?;
- Partnerships – ancestry, local history groups, local genealogy society, Genealogy society Utah; and
- Internships – partner with higher education providers