

Custodial policy for digital records: consolidated comments June 2005

Source [anonymised]	Sectoral characteristics	Comment	TNA observation	TNA response (changes to Policy)
1. Respondent 1	Public record body / OGD	<p>We support the principle of early transfer of digital records - it transfers the problem of maintaining them and providing access to TNA.</p> <p>We are not currently in a position to enter into an agreement about timing of transfer of digital records to TNA. We need to make more progress on EDRM first</p> <p>We support the principle of folder level review of digital records rather than the file by file review approach taken in the paper world.</p> <p>Additional comments: This is likely to involve a review function for business areas operating within a centrally managed RM policy</p> <p>Has anyone looked at the timing and technical IT standards of the storage of data? It</p>	<p>Noted</p> <p>Noted</p> <p>Noted (comment on appraisal policy & its implementation in any case)</p> <p>It could be organised in this way in a large dept., though this may not be necessary with a good corporate classification scheme</p> <p>The technical standards are going to centre on metadata and format, rather than more ephemeral media issues. Storage media is subject to a lot of change, such as the</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p> <p>None</p>

		<p>would be helpful to have more information about the proposed technical standards and how they could apply to departmental systems</p> <p>Also the cost to business areas of the appraisal and frequency of transfer of records? eg we will need team in each business area to have responsibility for appraisal and review of e-records</p> <p>To identify the records to be preserved we'll need clearer bit of guidance on what TNA will want, ie will need clearer selection policy [9.6 Code of ?]</p> <p>Will need to work with [OGD] to ensure that records are identified early so they can be identified with correct registration for tracking etc and disposal</p> <p>If earlier appraisal - sensible for electronic - then increased workload with slow (eg paper) material also needing to be reviewed - staff/resource implications. If</p>	<p>balance of advantage from tape to spinning disk. See digital preservation guidance notes on public website on selection of media and media handling (http://www.nationalarchives.gov.uk/preservation/advice/)</p> <p>[See previous answer-but-one]</p> <p>This comment will be fed to the Inspection and Client Management Unit and Appraisal project</p> <p>[The remaining comments have been treated as mainly internal communications and reflections]</p>	
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2. Respondent 2	Public record body / OGD	Macro appraisal - both this draft policy and the TNA's Appraisal Policy have promoted the idea of macro appraisal by function for	Implementation work on the TNA Appraisal policy is proceeding in collaboration with piloting departments and agencies and these comments will be fed to the Inspection and Client Management Unit and Appraisal	None

		<p>digital and hybrid records - a move away from the traditional Grigg system of file-by-file review. Although broad collection themes have been identified by the TNA no specific guidance appears to be available now at authority or agency level. This will have an impact on fileplan preparation within [our organisation] i.e. do we need to be able to flag particular categories of records from the outset. Can the TNA provide guidance in the short term even if reviewing of digital records will happen in the slightly longer term. (This could possibly be achieved through the use of more OSP's covering all the collection themes)</p> <p>Earlier appraisal - the policy suggests a range from the end of active life up to 10 years. Further definitive guidance is required and in light of the fact that digital media is 'vulnerable' in nature and the frequency of technology change is great, we don't believe this should be any longer than 5 years with transfer to TNA by 10 years from creation. Again a clear decision should be taken now so that appraisal timings and retention scheduling can be built</p>	<p>policy manager / project manager</p> <p>Data is being gathered within the Technology watch project (including a file format registry) of the Seamless Flow programme on the longevity of file formats and there is a close relationship between this work and the custodial policy [see next comment below]. UKAEA's willingness to transfer archival material prior to 10 years is noted and can be incorporated into a transfer agreement</p> <p>We are currently working on providing a rationale for file format selection, to be followed by recommended formats to update that issued in 1998 and by <i>ad hoc</i></p>	<p>None</p>
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		<p>into organisation's fileplans at the outset. This is the most effective method of ensuring identification of digital records of continuing value. But it needs to be done as fileplan's are being created rather than retrospectively because of the resource implications and potential risk of failing to select digital records of continuing value.</p> <p>Technical standards - currently TNA have a list of 'acceptable' formats for transfer of digital records. It is important that the TNA provide a definitive archival format in the short-term to allow departments the time and resources to prepare to meet these requirements. As the preparedness for Open Government has shown this can take many years to achieve across all Government</p>	<p>preservation guidance on our public website</p> <p>See above</p>	<p>None</p>
3. Respondent 3	Representative of certain records repositories, incl. PoDs	<p>On first reading through the draft, I thought there was little exceptional in it. Much of it is simple statements of total commonsense. However on further thought I did start to consider whether it really made the future role of the PoDs clear, as I feel that the role and relationship will by necessity be changed by the move to digital</p>	<p>We have not and would not consider radical changes to the role of Places of Deposit without far greater discussion and consultation with them. However, there are also Places of Deposit appointed to hold their own records and fully intending to continue to do so; some have a business imperative to do so. These comments as they apply to Local Authority PODs will be passed to The National Archives Advisory Service [/ Archives Inspection Unit]</p>	<p>Changes have been made to the Executive Summary to clarify that we do not expect local authority PoDs to have digital preservation</p>

		<p>records. Perhaps the present draft policy is not the place to develop this, but it will need to be looked at before long. The following are just some of the issues which occurred to me:</p> <p>Why should local PoDs take on the responsibility for these records, which may be transferred to them at a relatively early date? The arguments of lack of space at TNA will no longer apply, and it would be appropriate to re-think the idea of local PoDs though from basics.</p> <p>The costs of preservation will be increasingly obvious to our parent authorities, who may not unreasonably start to query why 20% of the national archives are preserved at their expense and not TNA's.</p> <p>How easy and practical will it be to ensure that the PoDs have the capacity to house these records, and stay exactly in tandem with TNA in terms of the technical provision for preservation and access? And surely this staying in tandem will be essential? While there will be a need to develop regional or more local provision for preservation of such records,</p>	<p>As with other responses, we do not anticipate this happening overnight.</p>	<p>capability overnight and transitional arrangements may be necessary. Further dialogue with this community will also be initiated through the National Advisory Service</p>
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		<p>this may develop along different paths form those followed by TNA.</p> <p>Returning to the draft as such, I think the tone and level is appropriate. It is clearly enough written, and never gets too technical. The statement of the issue is very clear. It did also start to make me wonder about future use of section 3(6), a concern reinforced by the quotations from the Section 46 Code of Practice. Will it be acceptable in future to be placing digital records created by government in private or institutional hands unless there are guarantees of thorough controls to prevent future modification of something which is then presented as an official record? The FOI Guidance para 9.8 does specifically point to records not for permanent preservation being destroyed at the end of their administrative life. Where does this leave section 3(6)?</p> <p>My other comments are few. Ideally I would wish appraisal to be built into Departmental Disposal schedules, as a requirement (section 4) rather than just by preference. Any step</p>	<p>The point about records presentations under Section 3(6) is a pertinent one that had not occurred to us and requires further consideration</p> <p>Pro tem, an amendment is required to para 9.8</p> <p>This is agreed as a matter of policy and standards. The issue remains that only articulating it that way leaves open what should happen in exceptional circumstances where this has not for some reason been done</p>	<p>The point about presentations and other issues of concordance with the Standards framework is well taken and will be considered</p> <p>New wording added to</p>
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		<p>which prevents the unnecessary retention of records of no permanent value after the end of their administrative need must be built into process at every opportunity, and this does seem like such an opportunity. Similarly in section 6, I would suggest that the accessibility processes required for records of archival value should be used for those of extended business value. Unless there are major differences in costs between the two processes, then it is probably cheaper (as well as sounder as practice in case review results in the preservation of material previously seen as being of purely business value) to only have a single approach.</p> <p>I was a little thrown by the fact that PoDs seemed to no longer be mentioned after the Executive summary. In fact from section 5 onwards, it does read as though all the arrangements relate to transfer to Kew. While this is the case for the majority of records, I would suggest that it is important to emphasis to all Departments that the same standards are applied when transferring, whether to Kew or to a PoD. Local Record Offices as PoDs</p>	<p>Noted and agreed</p>	<p>The point about presentations and other issues of concordance with the Standards framework is well taken and will be considered</p> <p>New wording added to</p>
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		<p>have major problems arising from the failure of local creators of public records (such as health authorities) to operate to the same standards as TNA tries to ensure for transfers to themselves. For paper records this causes a lot of work, but if the same attitude is taken with digital records then nothing will survive.</p>		<p>clarify about presentations</p> <p>Wording adjusted to incorporate the transfer to PoD scenario</p>
4. Respondent 4	Representatives of a sectoral group of archivists, incl. PoDs	<p>We are glad that TNA is producing a policy document upon this issue. The draft includes much that is sound and useful guidance. However, we do have some queries and suggestions for changes:</p> <ul style="list-style-type: none"> • It would be helpful to spell out that the policy refers to 'born digital' records and is not intended to provide guidance relating to the digitisation of material created in other formats. The latter is something upon which separate TNA guidance would itself be of value. 	<p>Noted</p> <p>Noted and agreed, with the caveat that technical dependency tracking (a component of technology watch) will also be required for digital surrogates of paper records dependencies</p>	<p>None</p> <p>Wording added</p>

		<ul style="list-style-type: none"> • TNA has an advisory role in respect of records other than the Public Records. This is not made clear in the draft, and issues around such records are not really addressed. Such records may be received as archives in digital format having not been managed as set out in this document. This might be acknowledged, and it would be helpful if advice could be given on this issue. It would also seem appropriate to refer to the requirements for digital records in the <i>TNA Standard for Record Repositories</i>. • In a number of places in the draft, the words ‘or a Place of Deposit’ requires inserting after a reference to transfer to The National Archives. We suggest either that they be inserted or that a reference is made at the beginning that where such references to TNA occur, it should be understood that they be read as applying equally to Place of Deposit. • Executive Summary, last paragraph - we were struck by the use of the term ‘the national archival collection’, with which we were previously unfamiliar. 	<p>The policy only relates to the Public Records. These comments will be passed to the Advisory Service for consideration. It is hoped that we can promulgate good practice outward but have to start somewhere</p> <p>Noted and agreed</p> <p>A form of words was used to attempt to denote public records appraised of archival value, but this is not appropriate as it infers that other records are somehow</p>	<p>None</p> <p>Wording inserted</p> <p>[It had not been the intention to produce a new and confusing term and it will</p>
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		<p>What exactly is this?</p> <ul style="list-style-type: none"> • Section 6, paragraph 3 - suggest inserting 'and beyond' after 'government'. • Section 7.1 and footnote 5 refer to the 'harm test' in respect of the Freedom of Information Act. We thought this phrase might cause confusion as it is not actually used in the Act itself, and that it would be better if the specific terminology of the Act was used instead. • Section 9, and also the penultimate paragraph of the Executive Summary – the scope of the Public Records is, of course, wider than purely departmental records of Government, and we would hope that the Policy could reflect this. We would be particularly interested in whether an agreement to cover all sectoral organisations might be considered feasible, and if so how it would be implemented, and compliance monitored, particularly in the light of the comments elsewhere in the draft about forthcoming 	<p>not part of such a collection.</p> <p>The point is accurate, but largely beyond the scope of this Policy</p> <p>Noted, but the notion of the harm test is widely understood and commonly used by FOI practitioners</p> <p>Noted and of course agreed</p> <p>[The other proposal for a transfer agreement covering the entire sector would be a very major undertaking. Transfer agreements covering records destined for direct custody of the National Archives is the priority. We will return to this other issue later]</p>	<p>be eliminated]</p> <p>None</p> <p>None</p> <p>Changes to the wording to clarify have been introduced.</p>
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		mandatory standards.		
5. Respondent 5	Public record body	<p>It seems a little opaque, and I found it difficult to identify what it was trying to say and what the essential points of the custodial policy are. After reading it about three times, I think these are:</p> <ul style="list-style-type: none"> • you need a records management policy that covers all types of information digital information needs special consideration because it can be relatively ephemeral compared to traditional paper records; • in particular consideration needs to be given to ensuring that all relevant digital information is effectively captured and managed appraisal of digital records for retention needs to be continuous from their creation long-term retention of digital records needs to take cognizance of technical constraints <p>I would take some issue with the comment that "... storage of digital records is relatively and increasingly inexpensive ..." (p2). I believe this repeats a common fallacy based on the fact that the cost of physical storage media (.e.g. CDs, DVDs, magnetic</p>	<p>These comments are markedly at variance with the others received. The present policy does not articulate these points as they are present – as noted – in other National Archives’ guidance and the main point here is <i>custody</i> of the records, with other issues [including the technical ones] only appearing insofar as required to explain the custodial issues</p>	

		<p>discs) continues to come down with astonishing rapidity. What it ignores is that while the media is cheap, you need expensive computer suites to use them! The total cost of ownership of a system to manage an archive of digital records is not inexpensive (dumping everything to CD is not managing an archive!), and to say otherwise in a policy document of this nature it is not really helpful.</p> <p>Comment [2] This needs a bit of rewrite, it's very hard to understand. Having worked my way through piles of this type of material over the past weeks, what I think the authors' have done is lift fragments from a variety of National Archives and other documents (many of which are very worthwhile) and as a result the end product has lost cohesion.</p> <p>In agreement with [previous comment] I believe the key points are</p> <ul style="list-style-type: none">• You need a policy• The principles that govern the management of paper and electronic records are much the		
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		<p>same, the issues faced surrounding application of the principles are different. As a result you need documented procedure surrounding management, appraisal, retention and disposal of electronic records that is understood and implemented by the organisation. FOI, DPA and other legislation make this increasingly important.</p>		
6. Respondent 6	Records repository and Place of Deposit	<p>The general thrust seems very sensible, and identifies the issues. However, one issue seems to be left hanging. The 1958 Act still says that public records selected for permanent preservation should be directed to [TNA] or to such other place of deposit appointed by the Lord Chancellor. The concept of a place of deposit constituted in a local record office still exists, but whereas TNA is getting the technology in place to deal with digital materials, many County Record Offices are not.</p> <p>Partly this is because our problem is more complex; we can work with our</p>	<p>These comments are agreed and noted.</p> <p>We do not expect capability for digital preservation to appear overnight in all current Places of Deposit for paper records. As noted in other responses: we have a number of Places of Deposit that hold their own [electronic] archival records. The comment raises the possibility, which we shall consider, of different type of appointment to PoD status for the holding of another organisation's digital public records on behalf of the Lord Chancellor and clearly different inspection arrangements would have to be developed</p> <p>We shall monitor and promote the development of local solutions for digital preservation</p>	<p>See responses to other comments above: Executive Summary has been adjusted</p>

		<p>directing bodies to ensure that born-digital materials within the organisation are all tied to particular platforms or systems which can be migrated in bulk, and which are shared by the record office and the administrative departments. However, the majority of any local office's holdings are brought in from external organizations, who have very much their own ideas on what formats to use - my own friendly local vicar regards Bill Gates as the Antichrist and refuses to use anything tainted with the Microsoft name, so his parish materials are out of step with County Council policy to start with. Already we have been offered active websites for preservation, which are no use if they are held in static state - we have to be able to run them.</p> <p>Even an agreement on archiving Council materials is proving difficult; the ICT people are making it clear that historical preservation is very low on their list of priorities when they don't have the resources to provide adequate systems for current admin, and our objection to the Digital Policy for the organization - that it nowhere</p>	<p>through Digital Preservation Department and the National Archives Advisory service</p> <p>We are aware that the position with collected archives will be substantially different</p>	
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		<p>addressed the issue of permanent, as distinct from long-term preservation - was ignored. As far as we can see, our best chance is to create a stand-alone digital domain in which whatever we take in can be converted to one of a limited number of formats which can then be made available on machines not linked into the Council network, but our chances of getting funding for this are nil - hence I am trying to interest neighbouring offices in a joint strategy which might attract external funding.</p> <p>The bottom line is that many, if not most, of the existing places of deposit are not going to be able to cope with digital materials if asked to do so, and effectively the lack of this ability is no different from having a strongroom at 25 centigrade with leaks in the roof - the office would fail inspection. Does TNA have a strategy for dealing with this, and should it be a part of the Custodial Policy?</p>		
7. Respondent 7	Technical solutions provider	That all custodians of digital records need to consider the following when choosing an archive method or product given	These are pertinent comments but we have taken the view that only very broad technical issues should form part of the policy as such	None

		<p>the likelihood that the data volumes are likely to start small and grow quickly. Large data volumes have particular challenges which are not obvious when volumes are low</p> <p>The following need to be considered and addressed</p> <ul style="list-style-type: none">. Scalability - any solution needs to accommodate escalating data volumes and billions of entries with no system performance degradation beyond FOI constraints.. Survivability - get assurance that information generated by and stored with today's systems can be retrieved and maintained over future generations of technology advancements.. Adaptability - means to quickly incorporate and exploit higher density new and different technology as they come to market. Affordability - technology costs reduce, but migration of data will be the hidden cost.		
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		<ul style="list-style-type: none"> . Searchability - in an digital archive metadata is key. And choosing the technology that will allow searchability just as important . Accessibility - Retrieval from large volumes of aging data has time and cost implications . Modularity and flexibility - means designing for, and coping with, the range of technical options and the evolution of change with open interfaces and a 'technology-agnostic' approach 		
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- No substantive comments were received from the main departments transferring archival records to The National Archives, probably owing to previous discussions with them prior to the public consultation phase
- Few substantive comments were received from Other Government Department ['OGD'] public record bodies, perhaps also owing to previous discussions with them prior to the public consultation phase
- No comments were received from OGDs that are also appointed Places of Deposit ['PoDs'] for their own records

Main themes in responses

Some responses appeared to want more technical detail in the Policy, at least one expressed relief that it was largely absent. One organisation commented that the Policy was difficult to understand, a number of the others said it was not.

Responses from the Local Authority PoD community show some questioning of TNA's assumption that we should not disturb the general pattern of custody present in the traditional environment and which we should not have proposed to upset without far reaching consultation with their community. A respondent commented that TNA no longer has pressure on space as with paper.

An individual comment from a County Record Office reveals some apprehension that we may be expecting them to take custody of digital records long before they have the capability to do so. This may be owing to an oversight about the profiles of a minority of important PoDs: some of the bodies appointed as Places of Deposit under s.3[4] hold their own digital records already for extended periods and some as permanent archives, e.g. Ordnance Survey and other MoD trading funds.