

# Proposed framework of standards for the inspection of archive repositories and services

Proposals to change the current provision for  
archive inspection and advisory services provided  
by The National Archives

Consultation paper

CP 02/03

28 November 2003

A consultation paper produced by The National Archives

This information is also available on The National Archives website  
[www.nationalarchives.gov.uk](http://www.nationalarchives.gov.uk)



## Contents

	<u>Page</u>
INTRODUCTION -----	5
CONTEXT -----	9
HOW TO RESPOND -----	13
A: PROPOSALS FOR THE STRUCTURE OF THE FRAMEWORK -----	17
B: PROPOSALS FOR THE CONTENT OF THE FRAMEWORK -----	23
C: OTHER ISSUES: IMPLEMENTATION OF THE FRAMEWORK -----	29
ANNEX 1: CONSULTATION CRITERIA (CABINET OFFICE) -----	31
ANNEX 2: LIST OF CONSULTEES -----	33
ANNEX 3: CONSULTATION CO-ORDINATOR -----	35
ANNEX 4: STANDARDS AND BEST PRACTICE GUIDES -----	37
ANNEX 5: INSPECTION AND ADVISORY SERVICES PRIOR TO 2 APRIL 2003 -----	39



## **INTRODUCTION**

We are pleased to launch this consultation on what is a key area of concern for all involved in the business of managing records and archives.

The National Archives (TNA) was formed in April 2003 by bringing together the Public Record Office and the Historical Manuscripts Commission. The Chief Executive of TNA is both Keeper of Public Records and Historical Manuscripts Commissioner.

The creation of TNA has given us the opportunity to take a fresh look at standards already in place for the care and management of records and archives. Our aim is to ensure that the best possible advice and guidance is available from The National Archives to all who share our concern for the care and preservation of records and archives. In some cases their principal need might be to meet a statutory requirement (for example in keeping Public Records or Manorial and Tithe Documents, or in ensuring compliance with the Data Protection and Freedom of Information Acts). In other cases it might be completely non-statutory: for example to give assurance to governing bodies concerned about corporate accountability that records and archives are being cared for and made accessible according to today's best standards, or to offer similar assurances to private individuals and institutions which have loaned or donated their archives to a repository, or might wish to do so.

The first step in this process is to develop a TNA framework of standards bringing together all the relevant aspects of a record office's activities, from preservation to access and all points in between. We need to create a framework of standards to end any duplication and overlap between existing standards and guidance. A framework of standards will make clear to all those involved in the business of managing records and archives exactly what is

considered to be best practice by The National Archives. It will provide a clear set of criteria for becoming an “approved” or “appointed” record office. It will stand as a benchmark which funding bodies, government agencies and managers can understand and expect to be met. It may support the introduction of self-assessment of archive services by archival staff or their parent bodies. More generally and fundamentally, it could play a vital part in future co-operation to raise the standards of archival provision across the board.

We hope that this framework of standards will be helpful to all archives, regardless of their size, holdings, audiences or objectives. It is intended to be of as much use to the smallest community archives as to the largest local authority record office; and as much to a specialist media repository as to a business, private or charitable archive.

We do not wish to develop such a framework of standards without seeking the views of those responsible for the management and use of records and archives. We have raised the proposal of a TNA framework of standards on previous formal and informal occasions, and are confident that we are moving in the right direction with its development, but this consultation is the first chance for you to tell us where you think we should go from here. This will not be the last chance to have your say: we will be happy to take your views at any point during the consultation period, whether in writing or in person at meetings to which TNA staff have been invited to discuss this work, and in the period of testing the framework which will follow next year. We will even be happy to receive your views and suggestions once the final framework has been implemented, as we foresee this being a living, evolving framework which can be adapted as the profession’s ideas of best practice change and progress.

We hope that you will engage with this consultation, and we look forward to hearing your views over the next few months. Details on how to respond can be found in section three of this paper, and we hope that you will take this opportunity to help shape your – and our – future.

SARAH TYACKE

Chief Executive, The National Archives

CHRIS KITCHING

Secretary, Historical Manuscripts Commission



## **CONTEXT**

### **Background**

The National Archives was launched in April 2003, bringing together two existing organisations, the Public Record Office (PRO) and the Historical Manuscripts Commission (HMC) and combining their services and expertise. It is a national resource for anyone interested in, or with responsibility for, documents relating to British history, whether owners, custodians or users.

As separate organisations, PRO and HMC offered advice to archivists in public and private archives and records managers in central and local government on a wide range of archival issues. A summary account of the parallel operation of these two inspection and advisory services can be found in Annex 5 of this paper. The creation of TNA now makes it possible for us to extend our advice across a wider range of important archival issues, in particular preservation, archival access, records management, and developing fields of activity such as electronic records management and digital preservation.

### **What we intend to do**

One of the key objectives for The National Archives in 2003-04 is the development of a new “framework of standards” which will inform all its record office inspection and advisory work.<sup>1</sup> The structure and content of this framework of standards are the main focus of this consultation paper. The idea of a framework of standards supporting a new unified TNA inspection and advisory regime was first publicly raised at the Public Services Quality Group’s 7<sup>th</sup> Annual Quality Forum in November 2002, in a presentation given

---

<sup>1</sup> This is set out in TNA’s Departmental Business Plans 2003-04, in the following target: “To establish, in consultation with stakeholders, a common standards framework by March 2004 for the advisory, audit, liaison and inspection functions to be carried out by the National Archives in relation to other repositories and relevant archival bodies.”

by Steven Jones, then of the Public Record Office's archive inspection team. Building on the assent which the 100 delegates from across the archival sector gave to this proposal, the intent to develop the new framework has been included in our forward plans.

The development of a new, unified and comprehensive framework of standards will be helpful in promoting best archival practice and improving the archival health of the nation. It will also provide the basis for a unified TNA record office inspection regime. There may be scope for the framework to provide the basis for a self-assessment mechanism for archive services, which would enable archives or their parent authorities to take a flexible and independent approach to the review of their own archival performance and provisions. Such capacity for self-assessment tailored to the particular needs of individual archive services and authorities could be an invaluable aid to planning activities. The framework of standards might also be used to facilitate local, regional or sector-specific benchmarking, or other comparison between like services or authorities. It might also bring considerable leverage and emphasis to any co-operative venture to raise the standards of archival provision across the board.

We hope that this new framework will be applicable and useful to all archive repositories regardless of their size, content, audience and aims. We hope that the framework will cover areas not addressed by the current HMC *Standard* or PRO *Beyond The PRO*. We trust that it will be as useful to repository managers as to owners of archives and depositors, and as valid to funding bodies, government bodies, users and Regional Agencies for museums, libraries and archives as it will be to TNA's inspection and advisory work. We also hope that it will be widely recognised and endorsed as a strong and worthy source of archival best practice. We are keen to establish, through responses to this consultation paper, your views on these issues.

## **This consultation exercise**

Before we move ahead with the development of this new framework of standards we need to know your views on what will best meet your needs, and what the end result should be. We hope that the framework will become the basis on which record offices and other archive-holding bodies are inspected and (where appropriate) approved by The National Archives. We hope that it will also become our principal source of published guidance and advisory material on archival issues. We intend, broadly, that it will offer the basis for determining what constitutes an excellent archive service, but at the same time encourage and give guidance to all organisations and owners on making archival provisions which are appropriate for their own purposes.

The consultation will cover the whole of the United Kingdom, reflecting the UK-wide advisory role which The National Archives has. It is aimed at all those involved in the business of records management and archiving in the public and private sectors, all those who make use of public and private sector records and archives, and all those professionals, organisations and representative bodies active in records management and archiving.

This consultation is your chance to have your say, and we are hoping you will be forthcoming with your views. The consultation exercise is being carried out in accordance with the Cabinet Office's *Code of Practice on Written Consultation*<sup>2</sup>, as it falls within the scope of that Code. Details of the principles which this Code of Practice sets out, and which have been followed in preparing this consultation, can be found in Annex 1 of this paper. Please note that we have added an additional two weeks to the recommended consultation period to allow for the Christmas and New Year public holidays.

---

<sup>2</sup> Available at <http://www.cabinet-office.gov.uk/regulation/Consultation/introduction.htm>

An initial impact assessment indicates that the introduction of the proposed new framework of standards would not bring additional burdens, costs or savings to those affected. Rather the introduction of the framework of standards is intended and expected simply to draw together current provisions for archival inspection and advice into a more coherent framework than that which exists at present.

## HOW TO RESPOND

### What you can do

You may respond to this consultation paper in writing by letter, fax or e-mail. Please send your responses to:

Steven Jones  
Records Management Department  
The National Archives  
Kew  
Surrey  
TW 9 4DU

e-mail: [steven.jones@nationalarchives.gov.uk](mailto:steven.jones@nationalarchives.gov.uk)

Fax. 020 8392 5283

**The period of consultation will last 12 weeks, closing on Friday 27 February 2004.**

If you are responding on behalf of a group please give a summary of the group which you are representing.

If you wish to invite TNA representatives to discuss this consultation with you or your group in person, or if you have any general enquiries about this consultation process, please contact Steven Jones at tel. 020 8392 5318.

### What we will do

The National Archives will publish a response to this consultation in due course. Please ensure that your reply is marked clearly if you wish your comments to remain confidential, or if you do not wish to be identified as a respondent. However, the substance of confidential responses will be included in any summary of comments received.

Further copies of this consultation paper can be obtained from Steven Jones at the above address or by phoning 020 8392 5318. The paper is available on The National Archives web site at [www.nationalarchives.gov.uk](http://www.nationalarchives.gov.uk) A Welsh language version is also available on request.



## Proposals to change the current provision for archive inspection and advisory services provided by The National Archives

- A: Proposals for the structure of the framework**
- B: Proposals for the content of the framework**
- C: Other issues**



## **A: PROPOSALS FOR THE STRUCTURE OF THE FRAMEWORK**

Current TNA inspections of archive services are concerned, broadly, with archival storage and public access arrangements in what are generally well-established archive services around the United Kingdom. Inspection visits can also cover a range of related issues including record office constitution, finance and staffing levels. We are aware that our focus during inspection visits does not necessarily encompass all the activities in which archive services are engaged, or about which an inspection and assessment by TNA would be welcome. We are also aware that current PRO and HMC standards might not be relevant or easily applicable to all archives which wish to seek our approval, for example because of the scale of a small archive services' operations. We need to be sure that our standards are useful, applicable and relevant to all archive services, record-holding bodies, and the owners and users of archives and other records.

**QUESTION 1: Should we seek to develop a new TNA archival standard, and corresponding inspection and advisory regime which goes beyond the service we currently provide?**

.....

One of the main issues in this paper is to explore perceptions about how best to set out the standards which The National Archives considers to be best practice for the care and management of records and archives. We consider the best vehicle for this to be a single document, identifiable as The National Archives standard. We do not feel that there are adequate reasons to perpetuate the existence of two distinct standard and guidance documents, i.e. the *Standard for Record Repositories* and the *Beyond The PRO* guidance.

The work in hand has deliberately been termed a "framework of standards". Both the current *Standard* and *Beyond The PRO* are informed by other

standards, primarily *British Standard 5454 (2000): Recommendations for the storage and exhibition of archival documents*. We do not feel that it is desirable, or indeed possible, to seek to create a new TNA standard which encompasses all activities which make up the management of archives, given that so many other adequate standards and best practice guidelines have already been created and accepted by the archival community. Rather the proposal is to create a new TNA standard, essentially along the lines of the current HMC *Standard*, which is informed and supported by the most relevant and current standards and best practice guidelines available to each field of archive management. The content of this group of supporting standards is the subject of proposals in the next section of this consultation paper.

**QUESTION 2: Would a single TNA standard, which points to and is supported and informed by a raft of other relevant and generally accepted standards and best practice guidelines, be acceptable to you and (if relevant) your organisation? If not, what would you prefer to see?**

.....

The HMC *Standard for Record Repositories* (3<sup>rd</sup> edition, 2001) was devised and revised in consultation with all the major national and professional bodies in the field of archives. HMC approval against the *Standard* has been a benchmark, recognising that a repository meets the best current standards and provides a good or excellent service. For the governing body this has served as an independent external audit of a repository's operations, keying into the requirements of Best Value and other efficiency programmes in the public sector. For the private owner and depositor of records, approval has offered renewed confidence in the repository and its governing body. The Commission's judgements based on the *Standard* have carried weight with a wide range of grant-awarding bodies including the government Purchase Grant Fund, the National Manuscripts Conservation Trust and the Heritage Lottery Fund, all of which it advises. Within TNA, HMC continues to have this

advisory role. The Chief Executive of the National Archives is also now the Historical Manuscripts Commissioner, and the government continues to turn to the Commissioner for expert advice when allocating manuscripts and archives which have been accepted for the nation in lieu of tax. Approval (or substantial progress towards it) is increasingly seen as a necessary qualification for repositories wishing to be considered for an allocation. Following the *Standard's* revision in 2001 HMC actively sought the views of archivists, archive custodians, archive owners and all the major national and professional bodies in the field of archives, as to the revised *Standard's* worth as a benchmark for good archival provision. It received a resounding endorsement from across the profession. We therefore feel that it presents a very good foundation on which to develop a new TNA standard.

**QUESTION 3: If a single TNA standard, supported by other relevant standards and best practice guidelines, were your preferred structure, would a single standard based on the existing HMC *Standard* be acceptable to you and (if relevant) to your organisation?**

.....

The word "standard" implies a yardstick against which to judge acceptable provision. It is clear from the work of our inspection teams that some archive services are able to meet existing standards (such as BS 5454) while others are not. Many of those in the latter group, however, may nonetheless maintain archival facilities and services which are essentially sound and adequate for their holdings, audiences and objectives. In other words, their provisions are fit for the purpose which they are intended to serve. It has never been the practice of either inspecting team to use standards inflexibly to 'condemn' or 'disapprove of' archive services that do not meet them. But we have not hesitated to point out any shortfall in meeting standards, because we believe this is a more honest and helpful service to custodians and their governing

bodies, and offers the best hope for strategic improvements (with our further guidance where appropriate).

We propose that the new TNA framework of standards should be capable of recognising provision which is fit for the purpose of each individual archive service. There clearly needs to be a threshold above which an archive service is deemed adequate, and below which it is deemed to require improvement. This is the purpose of a standard. It may be argued, however, that an archive service which has been able to make very high levels of provision should be recognised as having achieved more than simply meeting a standard. Such recognition would be a reward for the achievement, an indicator to potential depositors that a particular repository would be a very good steward of their collections, and an indication to other archive managers of what can be achieved. Such a stratified system could help to ensure that archive services reach a threshold level of basic care, while encouraging efforts to aim higher and reach good or excellent levels of provision.

The National Archives has an important role in driving up standards of archival provision in all archive services, and in all circumstances in which the care of or access to archives and other records are provided. Although all individuals, bodies and archive services can be said to be seeking the highest standards of provision relevant to their own aims and objectives, it is clear these aims will differ from one archive service or individual or body to the next. The purpose for which a business holds archives may not be the same as the purpose for which a local authority record office or community archive holds them. Similarly a private owner of records may have aims which differ from those held by a government department. Differences in scale, holdings, audience, function and many other characteristics also give rise to differences in aims, objectives and behaviours.

The National Archives' framework of standards is intended to be applicable by all archive services, owners and managers. This is not to say that a small community archive should be expected to provide the same quality of archival provision as the finest new local authority record office. Rather, in this scenario, both bodies should be able to make use of the information, guidance and advice set out in the framework in order to support the best possible provision appropriate for their needs and objectives.

Certain archive services will have statutory or public responsibilities for the care of specific types of archives – those holding deposited public records by agreement with the Lord Chancellor, or as archives accepted in lieu of tax, for example – and these cannot be overlooked. Where parts of the framework of standards do not apply to a particular archive service, record-holding body or owner, however, it should still be possible for these interested parties to refer to the framework for guidance on the best standards and practice in all the areas which do concern them. It should also be possible for them, if they so wish, to be assessed against the framework and found adequate. Our starting assumption is that The National Archives' guidance and advice should always be proportionate to the needs and objectives of the archive or service seeking it.

**QUESTION 4: Would it be beneficial and appropriate if the TNA framework of standards were sufficiently flexible to encompass differing levels of adequate provision, to take into account the differing aims and purposes of archive services, owners and managers?**

. . . . .



## **B: PROPOSALS FOR THE CONTENT OF THE FRAMEWORK**

The previous section of this paper dealt with the proposed structure of the new TNA framework of standards. Whatever structure forms the new TNA standard or framework of standards, it seems clear that there are gaps in the current HMC *Standard* and PRO *Beyond The PRO* which ought to be addressed and filled by the new TNA publication. The purpose of this section of the consultation paper is to establish your views as to which areas are inadequately covered by current PRO / HMC standards and guidance, and which we should seek to incorporate into any new TNA standards publication.

The guidance publication *Beyond The PRO* is specifically targeted at those archive services which hold deposited series of public records by agreement with the Lord Chancellor. Although closely aligned with British Standard 5454 (2000) and other best practice guidance, its focus is on the legal requirements with which an archive service must comply if it is to continue to hold these public records. Though adequate for this purpose, its more general application to the wider archival community is limited. The provisions of the HMC *Standard*, which is also closely aligned with BS 5454, are not bound by any single piece of legislation, and as such are applicable to all types of record-holding institutions across the whole archival community.

Though more widely applicable, the *Standard* does not offer comprehensive guidance on best practice in every field relevant to the operation of publicly and privately funded repositories. Neither does it offer comprehensive guidance on the care and accessibility of records of every kind and media. The *Standard* does not offer standards or best practice guidance on cataloguing, for example, nor on wider aspects of access such as on-line public service delivery or outreach activities. It offers no guidance on legislative issues such as intellectual property rights. Other areas are not dealt with as fully as they might be, such as staff development, disaster

preparedness and strategic planning. Some new or developing areas of archival activity are missing altogether, including digital preservation and storage of certain specialised media.

**QUESTION 5: Which areas do you feel are inadequately covered by existing HMC or PRO standards and guidance, which should be included in any new TNA framework of standards?**

.....

Our initial research into the shape and scope of any new TNA standards and guidance indicates that certain areas of activity relating to new legislation might also be drawn into any new TNA standards publication.

The Freedom of Information Act 2000 (FOIA) imposes a duty on a wide span of public sector organisations to be able to ‘confirm or deny’ the existence of records and to supply information as required under the Act. The Environmental Information Regulations laid under the Act make specific – and no less comprehensive – provision for access to environmental information. Bodies subject to the Act include all central government departments and organisations as well as local authorities at all levels, and all those authorities which hold public records by agreement with the Lord Chancellor.

All organisations subject to the Act will need proper arrangements for managing their records if they are to meet their statutory obligations – information that has not been kept in an orderly manner is unlikely to be able to be found without expenditure of enormous effort. For this and other reasons, the FOIA includes, under section 46, provision for a code of practice on records management to be issued by the Lord Chancellor<sup>3</sup>. This code sets out how records of organisations subject to the Act should be managed. As

---

<sup>3</sup> This code was issued in November 2002 although the associated enforcement provisions have not yet been brought into operation. It can be seen on <http://www.lcd.gov.uk/foi/codesprac.htm>

the code is not yet in force it is not possible to say how effective it will be in promoting good practice on records management. However it is a non-mandatory code and it is unlikely that the Information Commissioner will act against breaches of the code unless they result in a breach of the Act.

The Data Protection Act imposes an obligation on a similarly wide range of bodies (and also on private sector bodies) to tell individuals, except in certain limited circumstances, what personal data about them is held and how it is used, and to provide a copy of such personal data. It requires also that personal data is held securely, used responsibly and kept only for as long as needed. Other legislation provides access rights at a local level, such as the Local Government (Access to Information) Act 1985 and the Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations under the Local Government Act 2000. All of this legislation requires effective records management for compliance.

The records management Code of Practice under the FOI Act, though not itself mandatory, demonstrates how new records management provision might be managed under a statutory framework based on approved standards and guidance. It looks at best practice; it considers the main issues of record keeping, such as functional responsibility for records within organisations, policy on record keeping, the creation and subsequent care of records, provision for easy retrieval of information and arrangements for the ultimate disposal of records and audit needs. It emphasises that all records, whether electronic or traditional, need similar care and provision, while also referring to the need to cater properly for the needs of the electronic age. It also deals with the vital issues of review and transfer and the management of records selected for permanent preservation.

**QUESTION 6: Should a new TNA framework of standards seek to include standards and best practice guidance on legislation such as the**

**Freedom of Information Act, Data Protection Act and Environmental Information Regulations?**

.....

Initial research also suggests that modern working practices, particularly the use of computers and computer-generated information and records, is a key area on which archival and records management guidance and standards are lacking in quantity and quality. Information recorded in digital format, whether “born digital” through computer applications such as word processors and databases or “digitised” through scanning or other similar mechanisms, needs to be managed from the point of its creation just as records in more traditional media are. The issues here are often separate at organisational level, with one body or individual managing current “traditional media” records, and another managing processes relating to “modern media” electronic records. For many archive services the business of managing current records and information in any format does not form part of their responsibilities at all. The purpose of this consultation paper is not to challenge this position but to establish views as to whether or not TNA standards and guidance on these subjects would be helpful to those organisations and individuals which are, or wish to be, operating in this newer field.

**QUESTION 7: Should a new TNA framework of standards include standards and guidance on the management of current records?**

.....

Neither the HMC *Standard* nor *Beyond The PRO* include any more than rudimentary guidance on the preservation of and access to “special media” archives. The term “special media” in this consultation paper should be understood to include magnetic media, optical disc formats, three-dimensional records, films, photographic formats, outdated computerised records such as

punch cards and archaic magnetic formats, and so on. Guidance on the management of modern electronic record formats such as web sites and computerised datasets are also absent from existing PRO and HMC guidance. All these specialised formats require particular and often unusual storage conditions, and special access arrangements.

**QUESTION 8: Should a new TNA framework of standards seek to include guidance on records in all media and formats?**

.....

Question 2 of this consultation paper seeks your views on one aspect of the structure of the proposed framework of standards.<sup>4</sup> Initial research, and discussion with archivists outside The National Archives, suggests that a single standard informed by a raft of other relevant standards and best practice guidance might be one of the possible structures preferred by the archive community. This structure has already been employed successfully in both the *Standard* and *Beyond The PRO*. Whatever structure your responses indicate to be the preferred way towards a new TNA framework of standards, it will be very helpful to know which other standards and best practice guidelines you feel should inform our development work. Accordingly, Annex 4 of this paper contains a list of those standards and best practice guidance publications which we feel are most valuable to those involved in the management of records and archives in the United Kingdom.

**QUESTION 9: Are there any additions to the appended list of standards or other guidance which you would expect to see included?**

.....

---

<sup>4</sup> Question 2: “Would a single TNA standard, supported and informed by a raft of other relevant and generally accepted standards and best practice guidelines, be acceptable to you and (if relevant) your organisation?”

**QUESTION 10: Should any of the standards or guidelines in our list be omitted as unhelpful?**

.....

**QUESTION 11: If such a list of standards and guidance were to be included in support of a new TNA framework of standards, should The National Archives aim to provide advice on interpretation and implementation of all standards within the framework?**

.....

## **C: OTHER ISSUES: IMPLEMENTATION OF THE FRAMEWORK**

Although this consultation paper is about the need for and structure of a new TNA framework of standards, your views on how any new framework might be used by The National Archives would be welcome. No specific questions are to be asked on this issue at this stage, however. TNA has set a separate Departmental Business Plan target for 2003-04 for this work:

“To devise a new system to monitor and assess provisions for archival storage and access in places of deposit” (BP 21).

It is intended to pilot test any new framework of standards after April 2004, at which time your views on implementation will particularly be sought. If your consideration of the questions in this consultation paper have given rise to specific thoughts on this which you would like to share with us at this stage, however, please feel free to do so, as we will be very interested to hear from you.

For example, do you feel that training would be needed in order for you to make use of a new framework? How might the new framework be monitored and enforced (e.g. physical inspection visits, self-assessment, peer assessment, remote surveying)? What resources might be required in order to support those trying to comply with a new standards framework?

Your responses on these issues need not be made within the period of the consultation.



## **ANNEX 1: CONSULTATION CRITERIA (CABINET OFFICE)**

The *Code of Practice on Written Consultation*, issued by the Cabinet Office in November 2000, set out new standards for consultation documents issued by the government. It aimed to increase the involvement of individuals and groups in public consultations, minimising the burden it imposes on them, and giving them enough time to respond. The *Code of Practice* applies to Consultation Documents issued after 1 January 2001

The criteria in the Code of Practice apply to all UK national public consultations on the basis of a document in electronic or printed form. Though they have no legal force, and cannot prevail over statutory or other mandatory external requirements (e.g. under European Community law), they should otherwise generally be regarded as binding on UK departments and their agencies, unless Ministers conclude that exceptional circumstances require a departure. The criteria should be reproduced in consultation documents, with an explanation of any departure, and confirmation that they have otherwise been followed.

1. Timing of consultation should be built into the planning process for a policy (including legislation) or service from the start, so that it has the best prospect of improving the proposals concerned, and so that sufficient time is left for it at each stage.
2. It should be clear who is being consulted, about what questions, in what timescale and for what purpose.
3. A consultation document should be as simple and concise as possible. It should include a summary, in two pages at most, of the main questions it seeks views on. It should make it as easy as possible for readers to respond, make contact or complain.
4. Documents should be made widely available, with the fullest use of electronic means (though not to the exclusion of others), and effectively drawn to the attention of all interested groups and individuals.
5. Sufficient time should be allowed for considered responses from all groups with an interest. Twelve weeks should be the standard minimum period for a consultation.
6. Responses should be carefully and open-mindedly analysed, and the results made widely available, with an account of the views expressed, and reasons for decisions finally taken.
7. Departments should monitor and evaluate consultations, designating a consultation co-ordinator who will ensure the lessons are disseminated.



## **ANNEX 2: LIST OF CONSULTEES**

### **Archive services**

- All offices which have been appointed places of deposit for public records
- All offices which have been approved by the HMC or which have subscribed to the *Standard for Record Repositories*
- National Archives of Scotland
- Public Record Office of Northern Ireland

### **Representative professional bodies**

- National Council on Archives
- Archives Council Wales
- Scottish Council on Archives
- The Society of Archivists
- Association of Chief Archivists in Local Government
- Welsh County Archivists Group
- Archivists in Scottish Local Authorities Working Group
- Historic Houses Archivists Group (HHAG)
- The Army Museums Ogilby Trust
- The Health Archives Group
- The Film Archive Forum
- The Religious Archives Group
- The Charity Archivists and Records Managers Group
- The School Archivists Group
- The Catholic Archives Society
- The Cathedral Libraries and Archives Association
- The Archivists in Independent Television Group
- The Parliamentary and Political Parties Archive Group

### **Regional agencies**

- The Regional Agencies for museums, libraries and archives in the nine English Regions

### **Non-archival bodies / standards agencies**

- Inter-Departmental Archives Committee
- National Audit Office
- Audit Commission
- Resource: the Council for Museums, Archives and Libraries
- Local Government Association
- The Information Commissioner
- Office of the Deputy Prime Minister

### **Funding agencies**

- Heritage Lottery Fund
- National Manuscripts Conservation Trust
- Purchase Grant Fund

### **Other professional bodies and user groups**

- Arts & Humanities Research Board
- Economic & Social Research Council
- Society of College, National and University Libraries
- Railway Heritage Committee
- British Genealogical Records Users Committee
- Federation of Family History Societies (FFHS)
- British Records Association (BRA)
- Royal Historical Society (RHS)
- The National Archives' User Advisory Group
- Business Archives Council
- Business Archives Council of Scotland
- British Association for Local History

### **ANNEX 3: CONSULTATION CO-ORDINATOR**

If you have any complaints or comments about the consultation process, you should contact the National Archives consultation co-ordinator:

Dr David Leitch  
The National Archives  
Kew  
Richmond  
Surrey TW9 4DU  
United Kingdom

Tel: 020 8392 5362

[david.leitch@nationalarchives.gov.uk](mailto:david.leitch@nationalarchives.gov.uk)



## **ANNEX 4: STANDARDS AND BEST PRACTICE GUIDES**

### **General**

Historical Manuscripts Commission *Standard for Record Repositories*, 3rd Edition, 2001

Public Record Office *Beyond The PRO: public records in places of deposit*, 1994

### **Records Storage**

BS 5454:2000 *Recommendations for the Storage and Exhibition of Archival Documents*.

### **Public Access**

National Council on Archives: Public Services Quality Group, *A Standard for Access to Archives* (2003) final endorsed edition (work in progress)

### **Cataloguing**

International Council on Archives, *General International Standard of Archival Description [ISAD (G)]*, 1994.

International Council on Archives, *International Standard Archival Authority for Corporate Bodies, Persons and Families, (ISAAR (CPF))*, 1996 (currently being revised: new edition expected 2004).

National Council on Archives, *Rules for the Construction of Personal, Place and Corporate Names*, 1997

### **Conservation**

BS 4971:2002 *Repair and allied processes for the conservation of documents - Recommendations*

### **Records Management**

BS ISO 15489-1 (2001) - Information & documentation, records management

Public Record Office, *Standards for the management of Government records* (Introduction, File Creation, Tracking Records, Disposal Scheduling,

Guidelines on the Planning of Records Appraisal, Retention, Storage of semi-Current Records), 1998-99.

British Standards Institution, '*Records Management -A Code of Practice*' (work in progress).

**Electronic Records**

PD 0008:1999 - A code of practice for Legal Admissibility and Evidential Weight of Information Stored Electronically

Public Record Office, *Management, appraisal and preservation of electronic records* (Vol.1 Principles; Vol.2 Procedures), 2nd editions, 1999.

BS 4783 *Storage, transportation and maintenance of magnetic media in data processing and information storage* Parts 1-8, 1988-94.

## **ANNEX 5: INSPECTION AND ADVISORY SERVICES PRIOR TO 2 APRIL 2003**

The National Archives was launched in April 2003, bringing together two existing organisations, the Public Record Office (PRO) and the Historical Manuscripts Commission (HMC) and combining their services and expertise.

As separate organisations, PRO and HMC offered advice to archivists in public and private archives and records managers in central and local government on a wide range of archival issues. These inspection and advisory services were informed by more than a century of investigation and observation of the UK archival landscape. That of the PRO derives from s.4(1) of the Public Records Act 1958, which states:

“If it appears to the Lord Chancellor that a place outside the Public Record Office affords suitable facilities for the safe-keeping and preservation of records and their inspection by the public he may, with the agreement of the authority who will be responsible for records deposited in that place, appoint it as a place of deposit as respects any class of public records selected for permanent preservation under this Act”

The inspection and advisory services of the HMC derive from its duty under its Royal Warrants of 1959 and 2003 to promote and assist the proper preservation and storage of manuscripts, and its specific statutory duty with respect to Manorial and Tithe Documents on behalf of the Master of the Rolls

Both inspection and advisory services have been found by our stakeholders to be immensely valuable, and have helped to drive up the standards of provision across all sectors of the archive profession. Combining these two services will ensure that all archives, whatever their size and function, can benefit from an equal level of care and support.

## **Existing standards and guidance publications**

In 1989, HMC and the PRO (together with the Scottish Record Office) agreed to a checklist of issues, based on BS 5454 *Recommendations for the storage and exhibition of archival documents*, which they would take into account in carrying out their respective inspections of record repositories. The intention was, as far as possible, to harmonise the inspection regimes. The checklist was published, with the agreement of all parties, as an appendix to the HMC *Standard for record repositories* (1st edition 1990, 2nd ed. 1997). This Standard was published by HMC on behalf of the wider archival community in order to give public repositories a set of benchmarks of good practice which were broadly similar to those required from museums by the Museums and Galleries Commission's museums registration scheme. The governing bodies of repositories were accordingly invited, on a voluntary basis, to subscribe to the HMC *Standard*, and many have done so. From 1997 HMC offered formally to 'approve' any public repository which after its independent inspection appeared to have met the HMC *Standard* in all essential respects.

After the HMC *Standard* was first published, the PRO separately issued further guidance, in the publication *Beyond the PRO*, on the standards that must be met by repositories seeking its approval as places of deposit for public records. This also drew on the recommendations contained in BS 5454, and included guidance specifically aimed at those archive services responsible for holding deposited series of public records by agreement with the Lord Chancellor.

## **Need for change**

There is evidence to support the view that present arrangements need to be revised, as almost inevitably there has been some duplication and overlap

between the two inspection and advisory services in the past. We are also aware that the HMC *Standard* and *Beyond The PRO* guidance do not offer comprehensive guidance on best practice in every field relevant to the operation of publicly and privately funded repositories. Although both documents and inspection regimes shared the aim of raising the standard of archival provision in the UK, the duality of the situation occasionally led to confusion among our constituencies and did not address the needs of the archival community to the fullest extent.

Good progress has been made towards the closer co-ordination of the two inspection and advisory teams since the launch of The National Archives. TNA now wants to provide a more harmonised approach to inspection, audit and advice.

### **The business context for this consultation exercise**

The broadest context for the development of the new Framework of Standards is described in two objectives of the *Government Policy on Archives: Action Plan*<sup>5</sup> which have been assigned to The National Archives:

Objective 3: “To ensure that public institutions, at local, regional and national level, select, preserve and manage their current records and their archives, regardless of medium, in accordance with the relevant legislative requirements, guidance and agreed professional standards.”

Objective 4: “To encourage private organisations and individuals to manage their records effectively, to preserve their historical archives and wherever possible to facilitate public access to them.”

---

<sup>5</sup> The *Government Policy on Archives* (1999) and its associated *Action Plan* (2001) are both available via [www.pro.gov.uk/archives/archivepolicy/default.htm](http://www.pro.gov.uk/archives/archivepolicy/default.htm)

Following on from this, paragraph 40 of TNA's high-level *Corporate Plan 2003-04 to 2005-06*<sup>6</sup> reads:

"In 2003-04 we intend to consult extensively with the community of records managers and archivists so that we have a clear idea about the forms of support from the National Archives which would be most welcome to them. With their help, we shall establish standards for the advisory, audit, liaison and inspections functions by the end of March 2004. As a first step, the hitherto separate inspection regimes of the PRO and HMC will be brought together. We shall continue to carry out formal inspections of local archives, specialist repositories and private archives wherever this is appropriate, taking care to avoid any duplication of effort. In recent years the archival community has made immense strides in devising self-assessment tools (for example, mapping survey questionnaires), which reduce but do not eliminate the need for traditional inspections based on BS 5454. This will allow us to concentrate our resources on the development of increased support in the areas of records management and regional outreach."

Work Programme 2 of our *Corporate Plan* contains the following statement of our contribution to Government policy and ongoing work: "We agree . . . preservation standards and access facilities for public records in places of deposit." One of the stated areas for development under this Work Programme by 2005-06 is "We shall promote improvements in the preservation of public records in places of deposit through . . . new guidance, issued in the light of the new British Standard (BS 5454:2000)". Work Programme 5 goes on to state that the HMC's roles under its Royal Warrant of 1959 will continue to be undertaken within TNA, including "[the development of] standards and guidance for archive and records management professionals."

---

<sup>6</sup> The text of our Corporate Plan is available at [www.pro.gov.uk/about/plans/cp\\_bp.pdf](http://www.pro.gov.uk/about/plans/cp_bp.pdf)

Our more detailed *Departmental Business Plans 2003-04* contain a specific target for the creation of a new framework of standards:

“To establish, in consultation with stakeholders, a common standards framework by March 2004 for the advisory, audit, liaison and inspection functions to be carried out by the National Archives in relation to other repositories and relevant archival bodies.”

