

## Records collection policy feedback and response

### Introduction

**Comment:**

I personally do not like the use of 'iconic' in the introduction, as it suggests that the value of the public records is the rare and unusual, which is not an emphasis most users would endorse, not least the family historians.

**Our response:**

We state in this initial sentence that this refers to some, not all of our records. This is merely an introduction to the document - more detail about the scope and range of records we collect follows.

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### Section 1 – Why we collect records

**Comment:**

Paragraph 1 - This should include specific mention of the approved places of deposit as well as the National Archives and cross reference section 4.

**Our response:**

Agreed - we have added this into the policy.

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**Comment:**

In 1 Why we collect records, the document states:

Collecting records enables us to:

- support openness and transparency and help to ensure the government is accountable for its actions

This is obviously very important, but this objective can only be fully achieved if the processes around record selection/non selection, retention and destruction are themselves open and transparent.

To this end, the document should advocate public involvement in any decisions which might result from the above listed events. That is not to say that public opinion is to have the final word on decisions resulting from such events, but the public should at least be able to comment before any irrevocable action takes place.

Central to a regime of public involvement in selection processes are the following:

- A clear statement on when departments should review records;
- A clear definition of what records departments can routinely destroy without reference to TNA.

These should appear in the Records collection policy

This policy should also state that a reasonably full description of each set of records reviewed and any record sets held by departments, but not reviewed by 5 years from closure should be available for public scrutiny on TNA's website.

**Our response:**

Under the Public Records Act 1958 public records bodies must select and transfer records for permanent preservation within statutory timeframes. Currently this is 30 years, although there will be a transition to a '20-year rule' beginning in 2013, meaning The National Archives will receive two years' worth of records each year until 2023. The National Archives will support departments in complying with the Act and one appraisal method which they may choose to use is the Grigg system of first and second review. However, it is ultimately the responsibility of each individual department to comply with the Public Records Act and they will determine how best to achieve this with the resources they have available. They are under no obligation to use the Grigg system of first and second review. Departments will, however, be working with The National Archives during the '20-year rule' transition period to ensure that their records are selected and transferred on time, enabling the public to comment before policies are finalised.

Any changes to the collection policies of The National Archives, or the Operational Selection Policies of individual departments are reviewed by the Records Decision Panel and then published on The National Archives' website so that the public have an opportunity to comment.

The National Archives is not empowered under the Public Records Act to approve all destructions. Departments are able at 'first review' to destroy records that are not of continuing administrative value and not felt likely to be of historical value or through retention and disposal schedules. When reviewing the remaining records for historical value, departments provide The National Archives with information on which records they are recommending for selection and those that are recommended for destruction. The National Archives will either approve these recommendations or discuss further.

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## **Section 2 – Whose records we collect**

**Comment:**

I did wonder if there should be some explanation of what are not public records – personal records of monarchy, local government records, armed forces (?) despite these being parts of 'government'. But I could see you might feel this is unnecessary if you are targeting this document.

**Our response:**

It is too complex to cover the scope of what is not defined as a public record in this policy. However, a reference to further guidance on public records bodies has been added as a footnote.

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**Comment:**

'collects records from all government departments' - but what about all the private companies which these days perform 'work' previously carried out by the government?

**Our response:**

Public administration has seen changes over recent years, including the contracting out of back office functions, partnerships with private sector bodies, and other emerging models. The terms of the contract will determine who owns the records created by a contractor in the course of a contract, and whether those records are public records.

We have added a further sentence to section 2 of the Records collection policy to include records that may be held or created on behalf of a government department by another body.

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**Comment:**

Paragraph 1 – The text refers to the exclusion of bodies falling under separate legislation for Scotland and NI. It would be useful to have a link to the PRONI website or to the 1923 Public Records Act (NI).

**Our response:**

We have added a footnote into section 2 of the policy.

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**Comment:**

My main comment relates to bodies such as Valuation Authorities and the NHS which do not always appear to have a clear policy on disposal/transfer of records (especially the former bodies), whilst the NHS Archives are almost inaccessible to the general public.

**Our response:**

Valuation authorities and local NHS bodies, including hospital trusts, are among the bodies which normally transfer records to appropriate local places of deposit rather than to The National Archives itself. Within the parameters of legislative requirements and operational guidance from the relevant government department (such as the Department of Health Records Management Code for the NHS), the appraisal, selection and transfer of such records is therefore a matter for agreement between the creating body and the receiving repository. Having said that, The National Archives will be making additional efforts over the next few years to ensure that local creating bodies such as valuation authorities and NHS trusts apply the same priority and standards to transfers to places of deposit as their parent bodies give to transfers to The National Archives.

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**Section 3 – Which records should be selected for permanent preservation****Comment:**

3.1.1 (The principal policies and actions of UK central government) - Definition of 'policy'. The Collection Strategy implicitly assumes that most government records staff and the public will understand what 'policy' means. This is a dangerous assumption. Can you include a definition of policy in the Collection Strategy? My own definition of policy is as follows:

- ‘The authoritative allocation of values’. This definition highlights two important aspects of government policy – authority and values. Political parties, pressure groups and individuals put forward values such as ‘Concern for the environment’, ‘Equal opportunities’ or ‘Free enterprise’ but such values need to be translated into specific aims and targets before any action can occur.
- Another pre-requisite of the translation of values into action is that someone has to have the authority and the power to get things done.

If the above could be worked into the Collection Strategy it will be clearer as to what TNA means by the term ‘policy records’.

**Our response:**

As this is high-level guidance, we feel that the definition of policy is too detailed a discussion to enter into here. There will be further supporting documentation to cover specifics in more detail.

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**Comment:**

Also under 3.1.1 there ought to be some reference to fiscal policy or management of the economy. This is an important theme as none of the rest of these categories would happen without this important work carried out by the financial departments of the civil service and government. Also, HM Treasury may be confused as to what Collection Strategy theme they ought to use when selecting their records for preservation. This can either be accommodated under 3.1.1 or under s.3.1.2 (structures and decision making processes in government).

**Our response:**

An additional bullet point has been drafted and added to the Records collection policy under section 3.1.1.

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**Comment:**

Section 3.1.3 P.7: ‘records relating to individuals or national and international events of significant contemporary interest or controversy’ – who decides what is ‘significant’ – and how?

**Our response:**

Government departments, agencies and non-departmental public bodies are responsible for determining what is significant and should be selected. However The National Archives, through supervision and monitoring, guards against subjective selection by one person or group.

The National Archives provides advice on what may be significant, for instance for case files and datasets, below:

[nationalarchives.gov.uk/documents/information-management/osp48.pdf](http://nationalarchives.gov.uk/documents/information-management/osp48.pdf)

[nationalarchives.gov.uk/documents/information-management/osp30.pdf](http://nationalarchives.gov.uk/documents/information-management/osp30.pdf)

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**Comment 1:**

Generally in the document there is an (inevitable) recurrence to appraisal and the destruction of records not selected for permanent preservation because they lack ‘historical value’. Clearly people may differ on what is of historical value and

perceptions of what is a matter for historical study may also change. I therefore wonder whether it might be useful to flag up more explicitly how 'historical value' is determined and by whom, to show that valuable material is not (I assume) lost by blinkered application of routine guidelines. Safeguards are referred to rather briefly but I feel the reference is somewhat tucked away. Perhaps some connection should be made between 3.4 and 6.3?

**Comment 2:**

Please explain how you determine 'collections of marginal historical or research value'. Given what I have found to be noted as 'destroyed', what was deemed not to be of 'historical value' some years ago, is now of great historical value to those of us trying to uncover hidden histories. By destroying records you are in fact manipulating history.

**Our response:**

The National Archives typically collects just 5% of the public records created by government. We accept that there can be difficulties in determining what may be of future historical interest at the time at which these collection decisions are made.

We have defined the determination of historical value in broad terms within this Records collection policy. The detail is then defined in Operational Selection Policies, written by individual departments, submitted for review at The National Archives by the Records Decision Panel, and then published online so that the public have an opportunity to comment. We encourage people to engage in this collaborative process, and thereby have a say in how these selections are made. Any feedback received is shared with the relevant government department and incorporated appropriately.

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**Comment:**

The document caters more for electronic information than in the past and the collection of websites is now covered; perhaps some additional detail on what TNA would like to collect over and above the web content might be generally helpful. This may influence the evolution of our own retention policies.

**Our response:**

We envisage that as more electronic information is published on websites there may be proportionately less to select for transfer by other means. In most cases the same selection criteria as detailed in section 3 will apply, irrespective of whether the information is held in paper or digital format.

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**Comment:**

There is no direct mention of records of genealogical value. It may be that many such records are covered under 3.1.3 The state's interaction with the lives of its citizens, but I think an explicit reference should be included.

**Our response:**

Records which are of genealogical value are included under 3.1.3 'case files, datasets and other records which contain extensive information about the lives of individuals or groups ...' We feel that an explicit reference to records of genealogical value is not necessary. Defining what constitutes a record of genealogical value can also be difficult.

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**Comment:**

3.1.3 first bullet point – The opening line might benefit from insertion of ‘selected’ case files, datasets, etc... to indicate that not everything is transferred.

**Our response:**

This policy as a whole is concerned with selection, therefore the case files and datasets referred to in 3.1.3 are those that will be selected. It is emphasised throughout the policy that not everything is transferred.

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**Comment:**

Record collection should reflect the deliberate change in the nature of central government since the 1980s.

Hence, under 3.1.3 ‘the state’s interaction with the lives of its citizens’, more should be made of the private sector intermediaries through whom the state has increasingly interacted with its citizens. For instance, any bank funnelling QE to small firms; any charity delivering social care on behalf of local govt; any contractor cleaning govt offices etc. i.e. any private body, financed by taxpayers’ money delivering a service previously delivered publicly and thus accountably.

If TNA[understandably] does not have the resources/space to fulfil this mission , it should at least campaign for such records to be kept and, as far as confidentiality allows, should privilege the collection of state papers dealing with the relations between the public/ private sector and the choice of actors through whom central government works.

Otherwise claims for ‘openness and transparency’ will be little more than a sham.

**Our response:**

When a public body is contracting out a service to a private company, the terms of the contract will determine who owns the records created in the course of a contract, and whether those records are public records. Our priority is to protect public records. It is not feasible for The National Archives to ask private bodies to deposit records here.

We have added a footnote to section 2 of the Records collection policy to include records that may be held or created on behalf of a government department by another body.

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**Comment:**

Para 3.2 last para. An important point to get understood. And I think this does it. Similarly 3.3.2 second paragraph regarding formats.

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**Comment:**

There is no definition of "dataset".

**Our response:**

We have amended this section to give an indication of what we mean by datasets in the context of the collection policy.

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**Comment:**

Digital datasets - these seem to be treated as stand-alone artefacts that can be migrated across platforms without losing their historical, evidential value. If you cannot maintain formats (3.3.2), or indicate the functionality of the platforms on which they were created and used, then you cannot illustrate their role in the development of government policy. If data, for example, is held on an Excel spreadsheet, you need to have some idea of the functionality of the latter to help future researchers understand the limitation of the dataset, and possibly why it was structured and used in a certain way. Perhaps some thought needs to be given to this.

**Our response:**

The National Archives has always been aware of the need to capture metadata and contextual information in order to make the content of the dataset intelligible to current and future users. The National Archives does not currently ingest datasets as standalone records; it currently captures datasets from government websites into the UK Government Web Archive where they can be viewed along with other supporting and contextual information. The National Archives encourages government departments to publish as much contextual information as possible.

In future, we hope to take large and complex datasets into our Digital Records Infrastructure, however this is currently a matter of considerable technical challenge and research interest across many national archives in Europe and beyond. We will collaborate where possible, and learn the lessons from this research to develop a practical long term solution.

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**Comment:**

My interest is in big statistical datasets such as the Census, and government sample surveys, and administrative data. It strikes me that TNA's most important role is to identify the more important datasets (although how low do we go?), and to make sure that at least one reputable institution has the responsibility for archiving them.

As an external user / observer the important things are that the datasets are preserved and are accessible, rather than which institution (whether TNS, UK Data Service, ONS, or similar) actually does it.

In this sense, the policy should be to work with users proactively identify datasets, and help ensure that plans are made for them, rather than obliging TNA to do it all.

I hope that this is of some help, if only to confirm that current practice is working.

**Our response:**

At the moment our policy is to take datasets that are published on government websites via the UK Government Web Archive, as more datasets are published under the open data initiatives, this creates a rich, timestamped resource, with accompanying contextual information about the data.

Selected datasets that cannot be published or captured into the UK Government Web Archive can be looked after by departments using The National Archives' Digital Continuity toolkit. The National Archives is considering taking closed datasets directly from government departments. We are aware that the UK Data Service at Essex University has a large collection of government data sets and we very much see this as part of the overall picture for collecting such material. More detailed work is needed in this space and it will be addressed as the second phase of the collection strategy work.

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**Comment:**

3.3.3 - 'we reserve the right to refuse records which are in an extremely poor state of repair'. If these records are deemed to be significant (then the govt. dept. should repair/restore/film them.

**Our response:**

We have added a sentence to section 3.3.3 to say that we can provide advice on the conservation or repair of damaged records.

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**Devolved administrations - Wales**

**Comment 1:**

There is no reference to devolution in the Collection Strategy with reference to Wales, Scotland and Northern Ireland. I think something on this should be mentioned. Not to could upset the Welsh Government with whom TNA has a Concordat with under the PRA 1958; The National Archives carries out archival work on its behalf until Wales gets its own national archive.

**Comment 2:**

The relationship with Scotland and Northern Ireland is clearly stated in the document and probably represents little if any change. As far as Wales is concerned, my recollection is that The National Archives rightly retained responsibility for Welsh archives for the foreseeable future after 1999, presumably until a separate record office were created. At the same time, I gather that a fledgling office in Cardiff may be collecting current archives created since 1999, and doubtless is developing a policy for their treatment and availability. If this is so, I wonder whether the document might usefully note the situation (in a footnote or, for example, in section 2 note 3) – and not simply to address sensitivities that might arise in some quarters.

Relations between the UK government and the devolved administrations are, of course, noted in section 3.1.2, but this does not quite meet the point of The National Archives' responsibility for Welsh records themselves. An example of the minor difference as far as Wales is concerned may occur in 4.1.2 in relation to 'local NHS records': my uncertainty perhaps highlights the desirability of clarity on the position of Wales's records.

**Our response:**

We have added an additional footnote into section 3 of the Records collection policy regarding responsibility for Welsh records.

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**Comment:**

1. Your introduction makes it clear that TNA covers both England and Wales. This clarity is welcome.

2. Page 4, second bullet point reads:

act as an archive of UK government, maintaining a record of past decisions and acting as a long-term memory for government

A reference to Wales would be appropriate. I suggest that the following would be suitable:

act as an archive of the UK Government and England and Wales,.....

3. Page 5 which refers to the organisations TNA collect from would benefit from a specific reference to the Welsh Government in the list of bodies. For example the second sentence could be amended to read:

This includes the Welsh Government, the Courts.....

A footnote at this point referring to the Government of Wales Act and option of the First Minister to apply to the Lord Chancellor for permission to establish a Welsh Public Records Office and take care of Welsh records in Wales. For Example:

Section 146 of the Government of Wales Act 2006 (GOWA 2006) provides that Welsh Public Records are governed by the Public Records Act 1958 until such time as the Lord Chancellor makes an order under section 147 of GOWA 2006 imposing or conferring functions in respect of them (for example, a duty to preserve them) on either the Welsh Ministers, or a member of staff of the Welsh Government. The First Minister for Wales has the option to apply for an order under section 147 of GOWA 2006.

4. Page 13 section 4.2. Transfer to places other Places of Deposit. Some information on the process involved under S3(6) PRA would be useful even if is as simple as a reference to obtaining formal permission from the Lord Chancellor for the transfer to take place.

**Our response:**

We have added additional references to the Welsh Government into sections 1, 2 and 3 of the policy (covering points 2 and 3 above), and additional information on the point suggested in 4, above, in section 4.2 of the policy.

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**Comment:**

In addition (to the above comments), under Section 3.1 Criteria, we would suggest the addition of references to the Welsh Government as follows:

3.1.1 The principal policies and actions of the UK central government and Welsh Government

final bullet point: records which detail changes in the strategic functions and obligations of the UK and Welsh governments, including ...

3.1.4 final bullet point: records illustrative of the property, rights and duties of the Crown and the UK and Welsh governments as a landowner or tenant.

**Our response:**

We have made these amendments to section 3 of the policy.

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**Section 4 – Where the records are deposited**

**Comment:**

4.1.2 - It indicates that any Places of Deposit (PoDs) that retain public records should consider the records as on loan from TNA. It is not normally encouraged for repositories to take archive collections on loan so why in this context? If it is to be considered as a loan then the conditions / expectations of this loan need to be set out somewhere (not necessarily in the collections policy). PoD will work hard and spend time and resources to manage and make the collections they hold available to an approved standard. This has to be done with some security and recognition of their input.

A suggestion would be to align the PoD to act as an appointed 'agent' for TNA. This would suggest that the PoDs are working to a similar standard as TNA and assisting in preserving the nation's heritage. There has to be some recognition that TNA and PoDs are working together for a range of reasons.

**Our response:**

When public records are passed to a place of deposit there is no change to ownership of the records. The statutory framework means that the records can only be held on a deposit, or loan, basis. The National Archives recognises the benefits of acquiring ownership of collections but recognises that it is not always possible and does not discourage repositories from accepting archive collections on loan. We have indeed published guidance on the terms and conditions for loan agreements, but these are ultimately a matter for individual archive services and their parent bodies.

Part 2 of the records management code issued under section 46 of the Freedom of Information Act applies to public records passing to a place of deposit as it does to those passing to The National Archives. Where the archival department of an organisation is acting as a place of deposit for records generated elsewhere in the organisation, there may be no transfer of custody between bodies, but we would still expect the department to document the change of status that has consequences for handling requests for access to the material. We have clarified our expectation in paragraph 4.1.2.

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**Comment:**

4.1.2 - BP [bullet point] 1 (Although this may not apply to digital records) - an interesting and valid inclusion which I think is how we will get a cost effective solution for preservation of material such as courts.

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**Comment:**

4.1.3 - Would TNA approve the transfer of public records to Scotland or Ireland if they were going to a PoD rather than the national archives? Additional clarity on whether this would be appropriate and what the expectations would be for any records transferred (e.g. managed to TNA standards, managed according to NRS standards, other, etc.) would be helpful.

**Our response:**

This would be an exceptional circumstance and consideration would have to be given to all the circumstances of a specific case. We do not feel it is appropriate to provide for such rare cases in this general guidance document, but we would be happy to advise on any specific instances in which this issue may arise.

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**Comment:**

Not sure the wording of the last sentence is quite right – unless you mean that records of the Scottish Government could be transferred to the National Archives if they contained any material relating to the other parts of the UK?

**Our response:**

We explain in the first paragraph of 4.1.3 that we are only referring to the records of the UK government, which have relevance to Scotland or Northern Ireland.

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**Comment:**

One point is at 4.2, from which it seems that sensitive personal data from/in public records may be given to other institutions as a gift. This may seem somewhat surprising, so I wonder whether a more reassuring form of words could be found to reflect the stringency with which TNA and the departments presumably assess the matter of security and confidentiality in these cases and provide for its maintenance.

**Our response:**

This point is addressed in the final paragraph of section 4.2.

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**Comment:**

Consider making it clearer that transfer to the Places of Deposit should be treated in the same way as transfer to the National Archives itself, specifically in relation to the documentation and preparation work carried out. To me this is the nub of the problem faced locally, and I know that you will appreciate this from your own previous life as a County Archivist. It may impose a burden on the local transferring bodies, but it is one they should have been meeting for years, so I would argue it is not really an additional burden. I think we need to get this requirement understood at the highest levels in the organisations involved and so it is appropriate to specifically include it in this document.

**Our response:**

We accept the principle that the standards for transfer to places of deposit should be equivalent to those for transfer to The National Archives and guidance issued in 2004 reflects this position (see [nationalarchives.gov.uk/documents/information-management/foi\\_guide.pdf](http://nationalarchives.gov.uk/documents/information-management/foi_guide.pdf) ). We intend to make additional efforts to ensure that this is

understood and adhered to by all transferring bodies as part of the implementation plan for extension of the 20-year rule to records transferred to local places of deposit.

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## **Section 5 – When the records are collected**

### **Comment:**

‘The National Archives cannot adequately protect such records and public records bodies must, with the approval of the Lord Chancellor, retain them until their sensitivity has diminished sufficiently for transfer to be possible.’ Is this really carried out? How would you know if the department concerned has not simply destroyed the records? Can you provide a list of permissions granted by the Lord Chancellor AND the dates when such records were handed over to the TNA?

### **Our response:**

Records which are selected for permanent preservation but retained at the point of transfer are listed as such on The National Archives’ catalogue. The exception to this is the operational records of the Security and Intelligence Services. It is the responsibility of the department to ensure these records are stored and managed appropriately until they can be transferred. These records can also be subject to FOI requests whilst held at the department, if the department itself is subject to the FOI Act. Once transferred, the catalogue is updated to reflect the date of which the record was received by The National Archives.

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### **Comment:**

I think that the section on the the shift to the 20 year rule is weak. Timetables and highlighting legal responsibilities will not ensure that government departments undertake the selection and transfer of suitable records. Departmental record staff are now being asked to double their workload each year, whilst staff numbers are being cut, and divisions being wound up. Something more robust needs to be put in place to ensure that the archival system in government does not collapse, with the loss of documents of important policy use and historical importance.

### **Our response:**

One of the reasons for refining our records collection policy and supporting documentation is to ensure that departments only select what is worthy of historical preservation. In that way, departments should be able to focus their efforts and be better able to cope with the 20-year rule. We are also revising all our processes to support departments working more efficiently in the preparation and transfer of their records, and have made some significant advances in this.

Departments have legal obligations under the Public Records Act to select and transfer records for permanent preservation within statutory timeframes. We will be collecting on behalf of the Lord Chancellor statistics from departments on files overdue and due for transfer, which will also be published on our website. It will be more transparent whether departments are selecting and transferring as expected.

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**Comment:**

5.2 - 'Transferring bodies must ensure that records selected for permanent preservation'. Who exactly decides which records should be preserved?

**Our response:**

The question of who within public records bodies is responsible for selection is covered in section 2. Further detail is given on selection in section 6.

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**Comment:**

The records collection policy will be useful in framing how we deal with the 30 Year Rule change, though we will need greater granularity in order to be able to identify which record collections we will need to transfer. We will work with The National Archives to develop this understanding.

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**Comment:**

It is useful to have the transition to the 20 Year Rule clearly stated in this document which will be ongoing for the next 10 years.

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**Section 6 – How we will administer this policy****Comment:**

6.2 & 6.3 - I just wondered why appraisal and selection are separated here. It is an unnecessary separation as they are two sides of the same coin. Would it be possible to bring these two sections together.

**Our response:**

We accept that the processes of physically appraising and selecting records do often happen at the same time, in order to determine which records should be preserved and which destroyed. We have, therefore, combined these two processes in section 6 of the policy.

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**Comment:**

6.4: Should reviewing access to information also include a review of EIR exceptions as well as FOI exemptions? Many government departments as well as NGDP will include environmental information relevant under EIR within their main records series.

**Our response:**

Yes, when a record is transferred, the responsible authority should consider whether an exemption in the FOI Act or an exception in the EIR applies. If an EIR exception is relevant to the access condition of the record, it should be specifically stated as the reason for closure when the file is transferred, in the same way that an FOI exemption would be cited when transferring a file. This is in accordance with the Section 46 code of practice section 18 *Determining the access status of public records before transfer* [www.justice.gov.uk/downloads/information-access-rights/foi/foi-section-46-code-of-practice.pdf](http://www.justice.gov.uk/downloads/information-access-rights/foi/foi-section-46-code-of-practice.pdf)

If the outcome of the access review is identification of specified information which the authority considers ought not to be released under the terms of the (FOI) Act or the EIR, the authority should prepare a schedule that:

- a) Identifies the information precisely
- b) Cites the relevant exemption(s)
- c) Explains why the information may not be released
- d) Identifies a date at which either release would be appropriate or the case for release should be reconsidered.

Such records will then be considered by the Lord Chancellor's Advisory Council on National Records and Archives. See more in section 5.2 of the policy.

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**Comment:**

Additional information will be needed to ensure that this collection policy can be implemented effectively including associated procedures and importantly making contacts for relevant sections more transparent or easier to identify. I am anticipating that this work will follow.

**Our response:**

Yes, we are also reviewing all of our guidance on appraisal and selection, in line with the new policy. Please see our existing Operational Selection Policies ([nationalarchives.gov.uk/information-management/projects-and-work/osp-subject.htm](http://nationalarchives.gov.uk/information-management/projects-and-work/osp-subject.htm)) for more detailed guidance applying to individual record types, or transferring organisations.