

Steven Jones
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19 January 2004

Dear Steven,

**THE NATIONAL COUNCIL ON ARCHIVES (NCA) RESPONSE TO THE
FRAMEWORK OF STANDARDS CONSULTATION DOCUMENT FROM THE
NATIONAL ARCHIVES (TNA)**

The NCA welcomes the opportunity to comment on the Framework of Standards. We hope you will forgive us for not confining our response to the questions framed in the consultation document.

General

When considering the framework, the Council was not clear whether TNA were proposing to look at developing a holistic framework of standards encompassing the whole range of records management and archive functions. The structure of the framework implies that TNA is aiming to continue its archive inspection work with the additions of some records management issues. We wonder whether there is an opportunity, with the prospect of new records management and archives legislation, to take a more radical and comprehensive approach.

Q1 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?

We would endorse and support the proposed integrated approach to developing a new TNA archival standard which goes beyond the service currently provided.

We very much welcome the statement in the introduction that the standard “*is intended to be of as much use to the smallest community archives as to the largest local authority record office; and as much use to a specialist media repository as to a business, charity or charitable archives*” (p6) but would like to comment on the implications of this statement.

We applaud the shift in emphasis to targeting archives on the basis of need rather than in response to a request for help. In saying this, we do recognize that TNA will need to fulfill its retained legislative responsibilities for the Places of Deposit. The shift will, though, require a significant change in outlook for the service if it is to truly drive up standards across the gamut of archives. A much more proactive stance will be required.

At the moment, we understand that there are 235 Places of Deposit and up to 60 repositories that are HMC “approved”. Given that best estimates suggest that there are close to 2,000 archives in the UK (notwithstanding the number of community

archives), this would suggest that the new service would require a significant change in scale.

We notice that the community archives network does not seem to be included on the list of consultees given at Annex 2. If the TNA has not already done so, we would suggest that you consult on the framework with Comm@net who may have some useful views on the ability of community archives to engage with the standards agenda.

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?

We would support the concept of the single standard, supported by a series of other relevant standards and best practice guidelines.

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? We would support the adoption of the HMC Standard supplemented by other standards, as both realistic and helpful.

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?

We would also endorse and support a flexible approach to standards development which was able to meet the needs and aspirations of archives whatever their aims and purposes.

This will, no doubt, have implications for the “yardstick” of acceptability referred to in the consultation document. Given the relatively low number of archives that meet current standards, the NCA would certainly argue that a different kind of standard regime might be needed, one which might offer more hope of attainment for many in the profession and beyond who are struggling to improve the care and use of archives in sometimes very trying circumstances. This is in no way to say that those that meet the very highest of current standards should not be encouraged to aim higher.

It may be that a suite of stratified standards relevant to different kinds of archives, that are helpful, stretching but attainable, would offer “the best hope for strategic improvements”. Clearly such stratification would need to be developed in close collaboration with its intended market.

Any issues of stratification would also need to define an acceptable minimum standard that could be widely adopted as an entry qualification for funding opportunities.

In this regard, we hope that TNA will be able to take full advantage of the successes of the Museum Registration Scheme, which has not only made a real difference to museum standards across the UK but has spawned a raft of Museum Development Officers mainly at County level that have created further capacity to drive up standards.

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?

As far as the inclusion of additional areas within the standard are concerned, we would support the inclusion of the range of areas outlined in the consultation document.

There may also be lessons to be learnt from the Museum Registration Scheme here in terms of covering areas such as the governance, legal and financial issues. It is possible to argue that such areas are an essential pre-requisite to providing any kind of service. The wide range of organisations responsible for archives would suggest coverage of these issues is certainly as important in our sector as in that of museums.

The NCA would also suggest that the emphasis on forward planning in the Museum Registration process would be worthy of incorporation.

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?

We support the inclusion of standards and guidance on those areas of legislation.

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

We would support the inclusion of standards and guidance on the management of current records.

We would highlight again the issue of how this framework might successfully incorporate the proposed national records and archives legislation and any subsequent standards and inspection regimes.

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

Ideally yes. We would support further emphasis on relatively new media on the basis of the now well-evidenced skills and knowledge gaps amongst archives and records managers. We would also support further emphasis on audiovisual archives for similar arguments and because of their potential for meeting the access and learning agendas.

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

We hope that TNA would take account of Resource's *Inspiring Learning for All* which has been through its pilot phase and will be formally launched shortly. For further information please see <http://www.resource.gov.uk/action/learnacc/00insplearn.asp>

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

No.

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?

The TNA should aim to provide comprehensive advice on interpretation and implementation where possible or be able to provide guidance on other bodies or individuals for clients themselves to approach for such advice.

Further Comments

Self-Assessment

We notice that the concept of self-assessment is alluded to throughout the consultation document. Whilst we do understand that self-assessment can be a powerful tool in professional development, we would advocate a system which provided for an element of self-assessment backed up by comprehensive independent objectivity. We would also underline how important physical inspection visits are in supporting the profession.

Implementation

Aside from the comments made under Q1 concerning the outlook and scope of the service, we would argue for a fully integrated, professionally qualified, standards team within TNA. Given the proposed emphasis on driving up standards across all kinds of archives, this integrated team would need to be equipped with a skills set broader than that of the previous PRO and HMC teams.

Promotion of standards

We hope that TNA will take full advantage of the opportunities to promote the standards via partnerships with other agencies and organisations. We are principally thinking here of how TNA might harness the considerable capacity of Resource's Regional Agencies, and the forthcoming Cymal, to push standards development across the domain, recognizing that there is now clear evidence from some English Regions that up to a third of all archives sit within museum and library institutions.

We would be happy to discuss further any of the comments made in this consultation response and would ask that you contact Katie Norgrove, our Policy and Development Officer in the first instance on 0208 392 5376.

Yours sincerely,

Nick Kingsley,
Chairman, The National Council on Archives