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Dear Yvette,

**Consultation Response from The National Council on Archives (NCA) to Resource's Draft Criteria for Development of a Cross-domain Designation Scheme**

Thank you for the opportunity to comment on the draft criteria for the development of a cross-domain Designation scheme. Many of our comments you will already be aware of, given that both myself as Chair of the NCA and Liz Hallam Smith, Vice Chair have been members of the archival working group for this project. We should, nevertheless, stress that this response represents the collective views of the Council.

Firstly, as I am sure you are aware, we very much welcome the move by Resource to create a cross-domain Designation scheme to support excellence in our domain with additional funding.

We are keenly aware that it is no mean feat to produce a cross-domain scheme that is truly workable and equitable. Nevertheless, we are disappointed to find that the key suggestion from the archival working group, that is, for Resource to consider development of a new strand of the Designation Scheme to make possible the Designation of special classes of archival records, has not found its way into the draft criteria as issued for consultation.

We understand that it is the view of Resource's internal development team for the project, that this idea should be considered more fully as part of Resource's work to develop the concept of a Distributed National Collection. It would be helpful to understand the rationale behind this decision. We believe, should the scheme move forward as it stands, that this rationale will need careful justification to avoid criticism from the archives domain that the scheme cannot meet the needs of its outstanding collections.

We remain concerned that the removal of the concept of classes of Designated material from the draft criteria has weakened the scheme acceptability to the archives domain. We remain of the opinion that a Designation scheme for archives is worthwhile and achievable, but that the scheme as it stand risks being misunderstood and seen as divisive. We are

anxious to avoid the scheme undermining the domain's culture of mutual support.

We still need to find a way of resolving the tension between the concept of Designation and the concept of a national network of local archive repositories. For decades, archivists have been trying to ensure (with increasing government backing through HMC and the PRO) that we build a consistent network of local archive services which offers access to a wide range of locally-generated records. These services are now broadly in place. Although they offer widely varying standards of care and service, efforts have been made to enhance the standards achieved by these services, and BS5454 in particular has been an effective levelling-up tool. We remain concerned that by seeking to pick out for Designation a handful of local repositories which adventitiously contain records that are exceptional in some way, we could imperil the development of others that are an equally important part of the network but either do not have a few particular star documents, or do not have the resources to prepare a Designation bid.

We would hope to encourage Resource to state that the work on a Distributed National Collection will lead to consideration of a parallel scheme for the Designation of nationally important but widely-distributed resources, emphasising that under this scheme collections which offer exceptional geographical integration as well as those with a strong subject focus are eligible for Designation.

The scheme as it is currently drafted is still written very much from the standpoint of subject collections, which we readily accept is broadly the basis on which most museum and library collections are organised. There are, of course, archive collections, such as special collections of manuscript material, which operate on the same principle, and these would have little difficulty fitting into the criteria. Many of the most important collecting institutions, however, are repositories with a geographical remit. Despite the inclusion of Museum examples, which bear points of comparison (e.g. Museum of London), we do not feel that the tests of quality and significance give sufficient weight to the value of collections which illustrate different facets of the history of an area. Britain's local archives make possible the kind of integrated local history for which this country is internationally respected, and which has a particular national significance given the historical importance of the county communities. At every point where terms like 'subject area' or 'subject focus' are used, we might wish to consider substituting 'theme' or 'focus' or 'collecting remit' as appropriate. We would encourage the internal working group at Resource to review the draft criteria with this perspective in mind.

Finally, we believe there are still issues about the kinds of evidence which may be offered for archives. The scheme calls for 'written confirmation of the quality of the collection from independent experts who are acknowledged authorities in their field'. This is particularly difficult, as many users (at all levels from academic to amateur genealogy) are concerned with documents relating to a particular place or area. Very few will be in a position to offer anything like an objective comparison between (say) the

estate archives of two counties; or will be able to do so only in relation to an extremely narrow field rather than the whole archive.

We very much hope that you will take these points on board. We remain very much committed to helping Resource make the future Designation scheme work for archives and would like to play our part in resolving this issues for the benefit of the sector as a whole.

If you would like to discuss any issues raised in this response, we would ask you to contact, in the first instance, our Policy and Development Officer, Katie Norgrove on 020 8392 5376 or by email [katie.norgrove@nationalarchives.gov.uk](mailto:katie.norgrove@nationalarchives.gov.uk)

Yours sincerely,

Nick Kingsley  
Chair