

Archival Reappraisal: The Immigration Case Files

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The issue of archival reappraisal has primarily been considered in relation to issues of archival custody and research use of specific archival fonds. The American archivist Leonard Rapport, who has pioneered thinking in the field of reappraisal, advocates the reappraisal and deaccessioning of fonds which pose custodial problems to archives because of their extent and infrequent use by researchers.¹ Rapport's position has been greeted with concern by many American archivists, who fear that reappraisal according to Rapport's criteria would lead to the destruction of records simply because few researchers have used them. These archivists recognize that the level of research use of a fonds is affected by many factors, only one of which may be the fonds' research value.²

Reappraisal, however, does have a place in archival theory, but not for the reasons put forward by Leonard Rapport. While the bulk of modern records and storage problems in our archives are inescapable facts of archival life in the 1990s, reappraisal is, in the first instance, an *appraisal* issue, not a custodial or reference issue. Most archivists are aware that no appraisal decision is perfect. Reappraisal is necessary, therefore, when the original appraisal decision has been discovered to be incorrect or incomplete. Reappraisal of an archival fonds, or a body of records scheduled for archival acquisition, should also be considered when the archives becomes aware of the existence of records which constitute a more valuable source of documentation for the same activities documented by the accessioned or scheduled records. It must be recognized that inappropriate appraisal decisions, and decisions to acquire records when more valuable records exist, are frequently made due to circumstances beyond the control of individual archivists and even of large archival repositories, and that provision for reappraisal should be made in such cases in order to preserve the highest-quality archival record possible.

My interest in archival reappraisal arose as a result of my experiences as the archivist responsible for the federal government immigration records held by the Government Archives Division of the National Archives of Canada. During my tenure as Immigration archivist from April 1988 to April 1991, it became increasingly apparent to me and my supervisors that the 1987 appraisal decision to acquire large numbers of

Immigration case files on a continuing basis needed to be reviewed in light of the enormous numbers of files of questionable archival value being transferred to the National Archives. Further appraisal activity in other important active Immigration records confirmed our suspicions that we were taking in the "wrong stuff." As a result, I was encouraged by my supervisors to re-examine the 1987 decision, making use of my expanding knowledge of the current information holdings of the Immigration programme and taking advantage of recent developments in archival appraisal theory.

My research on the Immigration case files has led me to draw the following conclusions about archival reappraisal. Archival appraisal decisions are often influenced by issues that have little to do with archival value, and which can result in incomplete appraisal decisions. It is important, therefore, to rethink appraisal decisions whenever it becomes apparent that the wrong records have been acquired, or that records exist which are of greater archival value than those which have already been acquired or scheduled for acquisition. Reappraisal should only be contemplated when the conditions which contributed to the flaws in the original appraisal decision either no longer exist or can be remedied. In effect, a reappraisal should take the form of a new appraisal, using knowledge gained since the original appraisal and using appraisal criteria based on sound appraisal theory. This case study will outline the history of the most recent appraisal of Immigration case files at the National Archives, suggest an approach to their reappraisal, and present the preliminary reappraisal decisions.

Immigration case files are a voluminous, decentralized series of paper files created by the Immigration component of the federal Canada Employment and Immigration Commission. The Immigration programme is responsible for deciding who will enter Canada as a permanent resident, for controlling the entry into Canada of successful candidates for permanent residence, and for assisting in the adaptation of immigrants to Canadian life.³ In the course of fulfilling its mandate, Immigration creates policy files, operational subject files on all matters relating to the entry of immigrants, automated databases which capture key information on each immigrant, and the paper case files, which document each immigrant case, as well as related microform records, such as the microfilmed immigrant visas, which constitute the legal record of an immigrant's entry into Canada. These files are created, in varying degrees, at national headquarters, regional offices, over 100 local Canada Immigration Centres, and scores of overseas posts.

For the past forty years, case files have been the backbone of Canada's Immigration operations. At least one case file is opened for each successful immigrant family or single adult immigrant. In 1989, 186,788 immigrant visas were issued, and 190,342 immigrants came to Canada, which will offer an idea of the number of files created each year.⁴ The majority of these files are created and maintained in over 100 Canada Immigration Centres across the country. In addition, a file on each applicant for permanent residence is opened in the overseas Immigration office which processed the application, while files on special or controversial cases are also opened at Immigration National Headquarters. Files often pass through various levels of the Immigration system as an immigrant or refugee faces, for example, an adjudication hearing, a deportation action or an appeal. At each level, additional documentation may be added to a case file, the bulk of such documentation consisting of standard forms which often serve as computer input forms. Each individual or family applying to immigrate must

complete an application for permanent residence and provide proof of education, and information on job skills, health and criminal activity, as required by Immigration officials. In Canada, sponsoring relatives must also fill out a standard form at their local Immigration Centre. Once the immigrant arrives in Canada, further standardized documentation will be added to the Immigration Centre file. Internal Immigration memoranda, correspondence with applicants and sponsors, and the odd rough note may also be found in the Canadian and overseas files.

The most recent archival appraisal of Immigration case files took place in 1986 and 1987, as part of the approval process of a retention and disposal schedule which was submitted in 1986. At that time, the retention and disposal of records created by the federal government was governed by Chapter 460 of the Treasury Board's Administrative Policy Manual, which required that federal departments create retention and disposal schedules for their records, and that these schedules be approved by the then Dominion Archivist. As with all the other schedules reviewed by the then Public Archives of Canada, the Immigration case files were appraised by an archivist, who specified which records were of potential archival and historical value and had to be transferred to the Public Archives on the expiry of the retention periods. In this case, the archival appraisal had required the transfer of all files opened prior to 1969; all files classified as "secret" or higher; all files concerning historic, controversial or precedent-setting cases; all files measuring more than 2.5 cm in thickness, or more than one volume in extent; all files from special file series created for immigrants of particular nationalities or races; and a sample of almost all the other case files created at both overseas and Canadian immigration offices.

As Immigration started to apply the schedule, they realized that more files were being received than had been anticipated, and that the files were generally of questionable archival value. Between February 1989 and November 1990, when I started investigating the problem, fifty-seven metres of Immigration case files and 313 reels of microfilmed case files were received in twenty-two separate accessions. In addition, there were also case files still being housed in six Federal Records Centres across the country, which had not yet been accessioned. Most of the accessioned files had come from only a handful of the sixty-five Immigration posts abroad which will eventually send files to the National Archives. It became obvious that a reappraisal of the case files was necessary.

The recognition of a role for reappraisal is not new to the Government Archives Division. All records schedules and their archival limitations are supposed to be reviewed on a five-year cycle, and amendments to archival limitations are fairly common. The 1986-87 Immigration case file appraisal was, in effect, a rethinking of appraisal decisions that had been taken on previous Immigration case file schedules. As well, the need for a reappraisal had been taken for granted before a single file was received, due to the unique problems faced during the 1986-87 appraisal, including the impact of the federal *Privacy Act* on records scheduling and archival appraisal; the need for a detailed records analysis of the Immigration case file system before an appraisal could be conducted; and the hearings of the Deschênes Commission on Nazi War Criminals. I shall examine these problems one by one.

The *Privacy Act* requires that each federal agency "dispose of personal information under the control of the institution in accordance with the regulations and in accordance

with any directives or guidelines issued by the designated minister in relation to the disposal of that information.”⁵ When the *Privacy Act* came into effect in 1983, departments and agencies subject to the Act began to submit retention and disposal schedules for personal information systems such as the Immigration case files, for the approval of the Dominion Archivist.

The Public Archives was swamped with these schedules, each of which required archival appraisal. The situation was ripe for appraisal problems, particularly since, by the early 1980s, many archivists had been sufficiently influenced by developments in social history to be aware of the research potential of case files and automated data on “ordinary” people.⁶ Archivists at the Public Archives who had to appraise great quantities of case files began to take appraisal decisions which resulted in the transfer of bulky case file series to the Archives, especially as there were no formal policies or procedures in place for sampling. Many of these appraisal decisions, however, were made without a great deal of knowledge of the other records created by federal government departments, in particular policy and subject files. It was not then Public Archives policy to require departments to schedule their policy or subject files before case files. In effect, due to the emphasis on scheduling case files, and a lack of information on other records holdings, the Public Archives often ended up documenting departments first through their case files.

An added complication was that, until late 1986, archivists responsible for the appraisal of textual and micrographic records worked separately from those responsible for the appraisal of automated information. Departments also submitted separate schedules for different record media. Archivists did attempt to cooperate across media lines, but it was inevitable that many appraisals were made without adequate knowledge of the complete context of information creation within departments. Archivists could decide, for example, to acquire a large series of paper case files without being aware of the potential value of a related automated system, or that an automated system may in large part have duplicated the paper records.

Yet another problem was the means by which the Public Archives handled the approval process for retention and disposal schedules. The Records Management Branch of the Public Archives was responsible for overseeing the efficient management of information within the federal government, and was supposed to act as controller when departments submitted schedules. Its records analysts were to verify that schedules were prepared according to the required format, that retention periods were appropriate, and that schedules covered all the records they were supposed to cover. Analysts were also to provide information and advice to archivists on records management issues, while archivists proceeded with archival appraisal. Unfortunately, due to limited resources and a large increase in scheduling activity, archivists often had to perform complex records analyses as well as archival appraisals: the two halves of the process rarely met in the middle.

The entire matter was complicated by the Commission of Inquiry on War Criminals, commonly known as the Deschênes Commission, the public hearings of which dragged the Public Archives and the records retention and disposal practices of the Immigration programme into the limelight and had a serious impact on the decisions taken by Bennett McCardle, the archivist charged with the task of appraising the case files. The Commission, which was established in February 1985 and reported to Parliament in

March 1987, raised a number of questions about how the federal government disposed of its records. Unfounded accusations by former Solicitor-General Robert Kaplan and by Sol Littman of the Simon Wiesenthal Centre for Holocaust Studies that the Public Archives had deliberately destroyed the case files of Nazi immigrants to Canada led the Commission to investigate records creation and records management in the Immigration programme, as well as the role of the Public Archives in the destruction of Immigration case files dating from the late 1940s, and the records scheduling and disposal process generally.⁷

Bennett McCardle conducted her archival appraisal during the time that the Deschênes Commission was investigating the destruction of postwar case files, and she was quite understandably sensitive to the attention being focused on her work and on the records in her care. She was also troubled by what her own investigations, as well as testimony before the Commission, were revealing about the precarious state of Immigration's control over its case files. It became obvious to McCardle that Immigration staff possessed insufficient knowledge of the workings of their own case file system, but she had only a limited amount of time in which to study it. While it is almost certain that she had a much better understanding of Immigration's case file system than the department itself, she was still very concerned that her inability to understand the system completely might lead to a wrong appraisal decision, which could result in the destruction of valuable documentation. Such destruction would again focus potentially damaging publicity on the Public Archives of Canada. McCardle was also worried that Immigration would destroy records without authorization while the schedule was still under consideration.⁸

McCardle's attention was also drawn to the huge effort recently made by archivists at the National Archives and Records Administration in Washington, D.C. to appraise the vast case file system of the Federal Bureau of Investigation. In 1980, the National Archives and Records Service (as it was then called) was ordered by a judge of the United States District Court for the District of Columbia to undertake an archival appraisal and develop a records disposition schedule for the records of the FBI. This ruling was made in response to a lawsuit which had been launched in 1979 by over fifty groups and individuals who were concerned that valuable FBI records were being destroyed with the permission of the National Archives.⁹ Like the Immigration case files, pressure was placed on archivists for a thorough and speedy appraisal of a huge, decentralized, and dauntingly complex system of records as much for political as for archival reasons. McCardle was uncomfortably aware of the similarities between the two cases, and was concerned to avoid taking any appraisal decision that would lead to a similar public controversy.¹⁰

Employment and Immigration Canada was also anxious for the Public Archives to provide quick approval of its case file schedule. The Deschênes Commission findings put great pressure on the Department to improve its records management operations, and it was still trying to cope with a moratorium on file destruction which had been imposed shortly after the establishment of the Commission. However, while Immigration wanted the schedule approved quickly, it was not able to provide all the information necessary to the records analysis and appraisal: in addition to exhibiting a disconcerting lack of understanding of its records systems, the format of the schedule submitted by Immigration bore little relationship to the actual organization of the

records; Immigration was unable to provide adequate information on related automated and micrographic records; and only incomplete information was forthcoming from the field offices.

The problems surrounding this appraisal were obviously very serious. Fortunately, the appraisal had been assigned to an exceptional archivist. In a matter of weeks, Bennett McCardle conducted an analysis of the many levels of case-file creating offices within the Immigration programme and the flow of information between them. Her appraisal report ranks among the best sources on the organization and functions of the Immigration programme.¹¹ Detailed transfer specifications for each of the twenty or more categories of record-creating offices were laid out. Quite understandably, however, in light of the problems surrounding the schedule, the report was much more of an information analysis than an archival appraisal. Relatively little was said of the potential historical and archival value of these records, and of the importance of their role in the larger Immigration information universe, simply because that larger universe was undefined and unknown.

In detail, the Immigration case file schedule required the transfer of the following categories of files:

1. All files opened prior to 1969. This limitation was intended to protect any documentation created before implementation of the automated Immigration data system.
2. All files classified as "secret" or higher. Case files which receive special security classification were found to be of potentially high informational value. In addition, a quirk of the Immigration records system resulted in the inclusion of valuable subject files within a special secret case file series.
3. All files concerning historic, controversial or precedent-setting cases, as determined by Immigration programme officers. Again, it was hoped that the transfer of these files would provide documentation of operations surrounding important cases.
4. All files measuring more than 2.5 cm in thickness, or more than one volume in extent. These "fat files" were believed to be of potential evidential and informational value, because the cases were probably of enough significance to have generated large amounts of documentation.
5. All files from special file series created for immigrants of particular nationalities or races. Immigration has maintained a number of special case file systems for certain ethnic and national groups. The largest of these was the Chinese Immigration case file system, which documents the deliberate discrimination experienced by Chinese immigrants at the hands of the federal government from the late nineteenth century until the 1960s.
6. A sample of almost all the other case files created at both overseas and Canadian immigration offices was to be transferred. This limitation was intended to result in the transfer of files of archival value as an aggregate for evidential and statistical purposes.¹²

As transfers of the case files started to arrive at the National Archives after the schedule was approved in late 1988, it became apparent that the archival limitation

requiring the transfer of a sample of most categories of case files was going to result in the acquisition of an overwhelming number of records of dubious archival value. The lack of time and opportunity to conduct a comprehensive archival appraisal, the dearth of information on related records in other media, and National Archives sensitivity to the implications of the Deschênes Commission and the FBI appraisal, had produced an archival appraisal that erred on the side of caution in determining the records required to be transferred to the Archives. As McCardle has put it, she was too afraid at the time to make any other decision than to call for the transfer to the Archives of an unprecedented number of records. She simply did not know enough about the records (and she probably knew more than anyone else) to risk destroying anything but those files with obviously no archival value.

Another major problem encountered during the original appraisal was that Immigration was not able to include electronic records in its retention and disposal submission to the Archives. The Archives was aware of the great research potential of the Immigration databases, but with only limited information on data elements and the integrity of the data, it was decided that the paper case files would have to serve the same archival purpose as the automated systems until the systems were appraised and acquired. Similarly, because an appraisal of Immigration's policy and subject records had not yet been conducted, the acquisition of case files was seen as a way of documenting the evidential value of certain Immigration activities.

As more information was subsequently gathered on the automated databases maintained by the Immigration programme, the need to acquire a sample of case files for statistical research also came into question. A great deal has been learned about the main Immigration data system, its statistical subsystems, specialty databases created for the purposes of policy analysis, and about Immigration's long-range plans to eliminate paper forms, which carry the bulk of the documentation on case files, in favour of direct data entry. At the same time, the staff of the National Archives have become more technically and intellectually prepared to appraise and acquire large databases. Similarly, as more was learned about the Immigration subject file system in the course of another records schedule and archival appraisal, the need to acquire case files for the purpose of documenting Immigration operations also became doubtful.

Another cause for concern was the sampling method that had been chosen for the vast majority of the files. The one selected was the "F" sample method, whereby all files on people whose surnames started with the letter "F" would be transferred to the National Archives. The "F" sample method had been proposed in a commissioned report delivered to the then Machine Readable Archives Division of the Public Archives of Canada in 1983, which concluded that among all surnames of Canadians and recent immigrants to Canada, those starting with the letter "F" were most representative of the population as a whole.¹³ Again, because of the need for a speedy appraisal and approval of the case file schedule, the National Archives had to settle for calling for an "F" sample, even though Bennett McCardle was aware of its serious shortcomings.¹⁴ Indeed, further investigation of this and other sampling methods used by the Government Archives Division has determined that the "F" method is not statistically valid, and results in large and unpredictable sample sizes. A number of languages do not include the letter "F," rendering this method highly unsuitable for sampling an immigrant population.¹⁵ Furthermore, most government case files, including the Immigration case

files, are not organized alphabetically, but numerically. As a result, it was impractical for records management staff to pull the required sample.

The problems surrounding the appraisal of the Immigration case files were extreme, but the conditions experienced during that appraisal obtain during countless other archival appraisals: the inability or lack of opportunity to arrive at a complete understanding of the total information context in which the records in question were created and used; the information management needs of the creating body; current research trends and specific researcher requirements; time and money constraints; and other 'political demands'. That these competing demands influence archival decision-making is no one's fault in particular, but they can and do result in unfortunate appraisal decisions. It is therefore essential to rethink appraisal decisions whenever it becomes apparent that an inappropriate decision has been made. Archival reappraisal should be viewed as an important and necessary component of the appraisal process. As a profession, we are still grappling with the question of how archival appraisals should be conducted; how then are we to approach retrospective reappraisal?

Leonard Rapport favours the deaccessioning of underutilized records as a collections management tool, where records would have to prove their worthiness for permanent preservation on the basis of their popularity with researchers. Rapport advocates that the large processing backlog experienced by most archives be formalized into a specific waiting period, after which the records would be selected for permanent retention or deaccessioned in their entirety.¹⁶ It is my opinion, however, that the best way to reappraise records is to conduct a *new* appraisal, using knowledge gained since the original appraisal and using an appraisal framework based on sound appraisal theory. Reappraisal should take place when an archivist realizes that the wrong records have been acquired, or that records exist which are of greater archival value than those which have already been acquired or scheduled for acquisition. Furthermore, reappraisal should only be contemplated when the conditions which contributed to the flaws in the original appraisal decision either no longer exist or can be remedied. Ideally, three conditions should be present whenever an appraisal or reappraisal decision is made: the archivist should have as complete an understanding as possible of the functions and organization of the creator of the records being reappraised, and of the information universe in which the records were created and used; archivists should be aware of, and use, the growing body of theory on archival appraisal when making appraisal decisions; and appraisal and acquisition should take place in an environment in which archival concerns take precedence over other concerns as much as possible.

Some new developments at the National Archives of Canada should help archivists come to grips both with the task of reappraisal and with new appraisals in the future. These are the National Archives Acquisition Strategy and its related research projects, and the recently implemented Planned Approach to the Disposition of Records of the Government of Canada.¹⁷ These new strategies are intended to result in a research-oriented, archivally-driven approach to the appraisal and acquisition of government records.

Work on the development of an acquisition strategy at the National Archives of Canada has entailed numerous steps, such as arriving at an understanding of the relationships between the public and private sectors in Canadian society; weighing the pros and cons of the provenance-based versus the thematic approach to acquisition; in-

depth research projects on specific themes in Canadian society, and the structure and functional character of federal government records creators; the identification of specific acquisition targets; the redefinition of what constitutes "national significance"; and the encouragement of acquisition networking in the Canadian archival community, and the development of acquisition strategies in all Canadian archives.

The Planned Approach to the Disposition of Records of the Government of Canada requires the creation of "Multi-Year Disposition Plans" for all federal government departments and agencies which are required to seek the approval of the National Archivist before they may dispose of records.¹⁸ In this approach, all federal government departments and agencies have been placed in priority order for records disposition. Archivists are then to conduct research into the nature of the information created by each department or agency, and thereby determine which programmes create records of the greatest potential archival value. The National Archives will then enter into agreements with all departments and agencies to require them to create records disposal schedules for all of their programmes in an order largely determined by the potential archival value of the records.

Also useful in the reappraisal of the Immigration case files has been literature on "documentation strategy," and Terry Cook's forthcoming RAMP study entitled *The Archival Appraisal of Records Containing Personal Information*.¹⁹ One of the basic concepts of documentation strategy is the extensive linkage between records created by governments and private organizations and between records of all media. In this sense, no institution or record is an island; the proliferation of government and private bureaucracies, and the now clichéd "information explosion," mean that any one event, person or place can be documented by television and film, by photographs and artwork, by maps, by data in an automated database, and by books and articles, and that any of these records can be created simultaneously by multiple layers of government as well as by business, institutions, and individuals. What archivists need, then, is a strategy to help them decide which events, people, and places need to be documented on a long-term basis, and what the nature and scope of that documentation should be. Unlike the acquisition strategy of one repository, the documentation strategy could conceivably involve a number of archival institutions, libraries, educational institutions, and creating institutions.

In his forthcoming RAMP study, Terry Cook contends that traditional appraisal methods have archivists assessing the potential long-term evidential, informational and research value of specific series of records before actually establishing whether the series was worthy of appraisal in the first place. With the vast quantities of records available for archival acquisition, such an approach is no longer feasible. Cook therefore advocates what he calls the "mind over matter" approach to appraisal, or "macro-appraisal," for personal information records. This approach will enable archivists to determine which of all the series of records created in a society are the best candidates for archival preservation. Cook has been greatly influenced by a number of European archival theorists, who believe that the records chosen for permanent retention must be those records which best document the issues, events, and ideas considered *by the creating society* to have been of the greatest importance to that society.

Cook proposes that archivists use a theoretical model of how society functions to help them make their macro-appraisal decisions. Cook's model is based on an

understanding of the nature of the interaction between citizens and the state in a democratic society, just one of the many different types of interaction that occur. The essence of this interaction must be established in order for the archivist to determine first *why* records are created. It is in answering the question of why records are created in the course of the state-citizen interaction, that archivists begin to understand which of all the personal information records created by a government are of the greatest potential value. This value is determined by the extent to which a particular interaction results in the creation of an "image" of the society in which the interaction takes place. Cook views this process as intellectually demanding work, requiring archival and historical research in order to understand the nature of the citizen-state interaction, the complexities of state agencies, and the inter-relationships between organizations of the state and organizations of the private sector.

Such ideas and procedures can be adapted for use in the reappraisal of the Immigration case files. Four steps would be followed in this reappraisal. The first would be to determine whether the theme of immigration to Canada is one of sufficient importance to our society to warrant the preservation of a record of it for the future. This step seems obvious; it is doubtful whether anyone would deny that immigration is an important aspect of Canadian society. In the case of some other narrower topics, however, the answer may not be so obvious. At this stage, some of the work on the National Archives Acquisition Strategy would be helpful in determining the importance of the broad theme of immigration, and especially of numerous related subthemes.

In the second step, all actors and interactions in the immigration experience would be identified and the relative importance of these interactions, government and private, within the immigration process assessed. The actors are the people or groups of people who actually create the records which will be appraised, and include federal government agencies involved in the process of immigration and settlement;²⁰ provincial departments of community and social services; municipal social benefit programmes; community, ethnic or religious organizations involved in sponsoring immigrants and helping immigrants adjust to life in Canada; the immigrants themselves, along with their families in Canada; and any other interested parties. The interactions are the situations in which two or more actors become involved in a relationship, which could be as complex as the immigrant selection process or as simple as the exchange of letters between a prospective immigrant and relatives in Canada. Archivists must understand the ways in which all these diverse individuals, bureaucracies, and organizations interact not only within the parameters of the legislated and regulated immigration process *but also outside it*.

In the third step, the archivists would choose the most important actors and their records for further appraisal. All the records, in all media, of a single actor or case of interaction, in this case the federal Immigration programme, would be appraised comprehensively for their archival value, and decisions taken as to what portion of the entire record will be acquired by which archival repository. It is at this stage that the archival value of the case files would have to be established in the context of all the other records created both by the Immigration Programme, and by other government agencies as well as private organizations and individuals.

In his RAMP study, Cook proposes useful appraisal criteria for determining which of the case file series created as a result of citizen-state interaction are of the greatest

potential archival value, that is, which records provide the “sharpest” image of the creating society. According to Cook, these records will be those which demonstrate significant differences between the goals and the actual results of a government programme. Other appraisal questions to be asked of the records include whether the documentation is created directly by the employee and/or the citizen; how much leeway is allowed both sides of the interaction in determining what and how much information will be recorded; do the records include rejected or unsuccessful cases as well as successful ones.²¹

The fourth and final step in the reappraisal process would entail specific appraisal decisions as to what files will be acquired, assuming that the records are deemed to be of archival value at all. This final step in the appraisal should be done according to institutional appraisal criteria.

As yet, only tentative reappraisal decisions have been made on the Immigration case files. The main recommendation will probably be to cease acquiring a sample of most of the case files. Immigration’s automated systems capture most of the information on individual cases that could be used for statistical research; these automated records are already used extensively for statistical purposes by Immigration departmental researchers, demographers, and other social scientists. The National Archives has advanced far enough in its electronic records programme to acquire these records on a regular basis and to provide the information to researchers. The recent scheduling of Immigration’s subject files also means that a sample of case files is no longer needed to document any aspect of Immigration’s operations and procedures.

More importantly, preliminary research into the nature of the interaction between the Immigration Programme and the immigrants themselves has shown that immigrants have very little opportunity to create documentation or express themselves through the documentation in the case files, and has confirmed my opinion that the files do little to reveal the “image” of the immigrant-Immigration Programme interaction. While information on immigrants exists in the files, it is information deemed appropriate to the case by the government, not the immigrant personally. According to Victor Malarek in his 1987 indictment of the Canadian immigration system, Immigration actually tries to discourage applicants from telling their own side of the story, through a brochure which warns that “unnecessary inquiries about the status of an application may slow the process.”²² Such a statement may well contribute to the shortage of records created by immigrants themselves in the official documentation. The government side of the interaction will be well documented through policy and operational records; basic demographic profiles of each immigrant will be documented by the Immigration data systems and the microfilmed records of entry.

The challenge now faced by Canadian archivists is to document the Immigration experience through the immigrants themselves. This is not the task of the government records archivist alone; archivists responsible for the appraisal of private and public archives at the National Archives and at other archives in Canada should collaborate in researching and planning a strategy for the documentation of the immigration experience in this country.

The approach to reappraisal that is being advocated here will entail a significant amount of research and analysis. This will be true of all the initial appraisals and

reappraisals conducted according to newer ideas in appraisal theory. Over time, however, the amount of research and analysis necessary to such projects will decrease as the archival profession develops a better understanding of the ways in which society creates and uses documentation. As well, as our approach to appraisal improves, the need for reappraisal should begin to disappear. That will not happen, however, until archivists are given the necessary resources and authority to conduct sound appraisals in the first place, and until working-level archivists are able to share more of their ideas and information on appraisal with their colleagues. Others have made the case for increased archival networking and cooperation in order to share information on the existence of documentation and on appraisal decisions. This networking should occur not only at the level of heads of institutions, but at the working level, where the appraisal decisions are actually made. The Canadian archival system should be used in future to develop means by which appraisal activity, especially research, can be made available to all archivists. Archival appraisal is taking its rightful place at the forefront of archival theory and practice; for the near future, however, reappraisal should also be considered as a necessary and important part of the appraisal process.

Notes

- * This article is based on a presentation made at the Annual Conference of the Association of Canadian Archivists, Banff, Alberta, on 25 May 1991. I would like to express my gratitude to Jim Burant, Terry Cook and Dan Moore of the National Archives of Canada, for their valuable comments and constant encouragement; to my past and current supervisors Terry Cook, Dan Moore and David Enns; and to the National Archives of Canada for making it possible for me to speak in Banff and to prepare this article. I would also like to thank Bennett McCardle of the Archives of Ontario, who has shared with me her insights into the Immigration case file appraisal both recently and over the last five years. (The views expressed in this article are not necessarily those of the National Archives of Canada.)
- 1 Leonard Rapport, "No Grandfather Clause: Reappraising Accessioned Records," *The American Archivist* 44 (Spring 1981), pp. 143-50.
 - 2 See Karen Benedict, "Invitation to a Bonfire: Reappraisal and Deaccessioning of Records as Collection Management Tools in an Archives — A Reply to Leonard Rapport," *The American Archivist* 47 (Winter 1984), pp. 43-49.
 - 3 Immigration is also responsible for regulating the entry of non-immigrants into Canada, but this article is not concerned with any records relating to visitors.
 - 4 Employment and Immigration Canada, *Annual Report, 1989-90* (Ottawa, 1990), pp. 40 and 42.
 - 5 Statutes of Canada, *Privacy Act, 1980-81-82-83*, c. 111, Sch.II "1", Section 6 (3).
 - 6 The appearance of *Archivaria* 14 (Summer 1982) was both a confirmation and an encouragement of the growth in the use of archival material in the writing of social history. The issue was devoted to articles on the use of a wide range of archival materials. The authors, including David Gagan, Peter Ward, Alison Prentice and Chad Gaffield, stressed the use of records not traditionally considered to be of archival value, or considered to be of value for other purposes, including case files.
 - 7 Jules Deschênes, *Report of the Commission of Inquiry on War Criminals, Part I* (Ottawa, 30 December 1986). In 1984, during its investigation into war criminals in Canada, the RCMP discovered that a large number of immigration case files were destroyed in late 1982 and early 1983. When Solicitor-General Robert Kaplan was told of this, he jumped to the conclusion that Immigration had intentionally destroyed documentation on the immigration of Nazi war criminals into Canada. See pages 208 to 214 of the report for a summary of the file destruction issue and the testimony of Public Archives and Immigration staff. See also Robert Hayward's article "Working in Thin Air": Of Archives and the Deschênes Commission," *Archivaria* 26 (Summer 1988), pp. 122-36, for a detailed discussion of the Public Archives' involvement in the Deschênes Commission, and the longer-term impact of archives-related testimony on the appraisal practices of the Government Archives Division. According to Hayward, the publicity received by the Archives raised its profile in the federal bureaucracy, and highlighted the role of the archives in the information management life cycle. The Commission's hearings and report also forced the National Archives to launch an attempt to make its appraisal, selection and sampling criteria more explicit, and to improve the documentation of appraisal decisions.
 - 8 Conversation with Bennett McCardle, 25 September 1991.
 - 9 For a thorough discussion of the FBI records appraisal, see James Gregory Bradsher, "The FBI Records Appraisal," in *The Midwestern Archivist* XIII (1988), pp. 51-66.
 - 10 Conversation with Bennett McCardle, 25 September 1991.

- 11 Memorandum, Government Archives Division, to Dr. Jean-Pierre Wallot, National Archivist of Canada, re Formal Submission, Immigration Case Files (paper only), 7 July 1987.
- 12 Other limitations applied to the records of specific offices only.
- 13 Jake Knoppers, *Report on Archival Sampling Strategy and Related Issues* (Ottawa, 1983).
- 14 Government Archives Division, Formal Submission, Immigration Case Files, pp. 108-109, and conversation with Bennett McCardle, 25 September 1991.
- 15 For a full examination of this and other archival sampling and appraisal issues in the Government Archives Division, see Terry Cook, "The Appraisal of Case Files: Sampling and Selection Guidelines for the Government Archives Division, National Archives of Canada," 9 January 1991.
- 16 Rapport, "No Grandfather Clause."
- 17 National Archives of Canada, Government Records Branch, *Disposition of the Records of the Government of Canada—A Planned Approach*, 3 July 1990.
- 18 The definition of what qualifies as a federal government institution, and therefore which institutions are required to submit schedules for the approval of the National Archivist, is found in the *National Archives of Canada Act* (35-36 Elizabeth II, ch. 1, s. 2). The *Act*, however, does not list the institutions which fit the definition. For a list of all the federal agencies which must seek the approval of the National Archivist in order to destroy records, see "Government-Wide Plan for the Disposition of Records, 1991-1996" (Report approved by the National Archivist, 20 November 1990).
- 19 On documentation strategy, see Helen Willa Samuels, "Who Controls the Past," *The American Archivist* 50 (Spring 1986), pp. 109-24 and Richard Cox and Helen W. Samuels, "The Archivist's First Responsibility: A Research Agenda to Improve the Identification and Retention of Records of Enduring Value," *The American Archivist* 51 (Winter-Spring 1988), pp. 28-42; Terry Cook, *The Archival Appraisal of Records Containing Personal Information: A RAMP Study with Guidelines* [Final draft submitted to the International Council of Archives, August 1990].
- 20 Federal departments involved in immigration and settlement include the Canada Employment and Immigration Commission, the Immigration and Refugee Board, the Secretary of State, and the Department of External Affairs.
- 21 Cook, pp. 26-27.
- 22 Victor Malarek, *Heaven's Gate: Canada's Immigration Fiasco* (Toronto, 1987), pp. 26-27.