

# *The Acquisition of Federal Government Records: A Report on Records Management and Archival Practices*

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*EDITOR'S PREFACE: After many months of research, case studies, and interviews, Bryan Corbett and Eldon Frost completed in December 1979 their report: "Public Records Division: Acquisition Methods." This study, popularly known as the "Corbett-Frost Report," has developed a clandestine life of its own. It has been sent across Canada and as far afield as Australia. It has been studied widely by those implementing records management-archives programmes. It has been used for training courses, referred to in speeches by senior officials of the Public Archives of Canada, and footnoted in at least two Archivaria articles. Most importantly, many of its observations and conclusions animated the new policy chapter on records management in the Treasury Board's Administrative Policy Manual. Effectively replacing the Public Records Order of 1966, Chapter 460 is being heralded by records managers and archivists alike as a new dawn for proper information control of government records. Furthermore, as the PAC's first report evaluating records management practices in various departments demonstrated in 1983, the problems identified by Frost and Corbett have not gone away; indeed, their 1979 findings and the more recent figures rarely vary more than a percentage point or two. As a "snapshot," then, of the records management-archival partnership some fourteen years after the Public Records Order, as a healthy debunking of many myths about the efficacy of records management in the federal government, and as a landmark document in the evolution of records management policy, the report deserves wider circulation than is gained by its present underground existence. Consequently, Archivaria is publishing an abridged version of it.*

*The central core of the report remains. To save space, the preface, executive summary, comments on methodology, and most of the extensive appendices have been removed, despite the voluminous statistical compilations contained in the latter which graphically demonstrate the arguments of the main text. Terms are left as they were in 1979: for example, Public Records Division and PRD (now the Federal Archives Division) and Public Archives Records Centres, PARC, and Regional Record Centres (now Federal Records Centres). Various figures for extents and volumes of records have not been updated, although as noted before the percentages involved have in reality rarely changed in the intervening four years. Small additions, deletions, and stylistic corrections have been made, but no attempt has been made to transform the "report format" into continuous prose.*

## 1. INTRODUCTION

Between 1872 and 1965, the Public Archives of Canada acquired approximately 16,700 feet of archivally significant textual records. As a result of a more vigorous acquisitions programme and the compulsory scheduling requirements of the Public Records Order of 1966, an additional 21,296 feet of archival records were acquired between April 1965 and December 1969. During the same period, the Records Management Branch expanded both its facilities and services to meet its new mandate. In 1969 alone, 164 records schedules or proposals for destruction were processed in compliance with the requirements of the Public Records Order and the Records Centres disposed of over 37,000 feet of records.

### *1.1 Records Management System*

Between 1965 and 1979, the Public Records Division (PRD) acquired 60,000 feet of records having potential archival value. The records management system of records scheduling, dormant storage, schedule applications, and microfilm submissions has accounted for a substantial portion of these acquisitions. Although it is impossible to determine what proportion of the material transferred to PRD came as a result of the application of the schedules in departments, it is possible to extrapolate the results for eleven departments.<sup>1</sup> Of the total acquisitions received by PRD, 40 per cent were through the use by departments of records scheduling and the dormant storage facilities of the PAC. However, some major departments such as Labour, National Research Council, Energy, Mines and Resources, and Agriculture rarely or never use the Records Centre for the storage of archival records. Other departments such as Transport use the Ottawa Records Centre solely for storage, and withdraw the material in order to apply the schedules within the department. An investigation of microfilm accessions indicates that most films were unscheduled and were acquired by direct transfer from departments.

Two major developments in the late 1960s raised the PAC's expectations that the records management system would be the key to acquisitions. The Public Records Order (PRO) in 1966 confirmed the control of all records destructions with the Dominion Archivist and required the scheduling of all departmental records by 1969. It was expected that the amount of material transferred to the then Public Records Section (later PRD) would initially increase dramatically. Future transfers would become regular and would show a relatively constant increase as the records created by wartime and postwar government growth were transferred. The statement in the House of Commons in 1969 by the Prime Minister regarding access (and the subsequent issuance of the Access Directive in 1973) led to the conclusion that "the results of the new policy on access will be to accelerate the transfer of records...."<sup>2</sup> On the strength of the compulsory scheduling of the PRO and the defined access provisions of the Directive, the Public Archives was to receive "on a regular and continuing basis accessions of records from departments each year."<sup>3</sup>

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1 These departments include Transport, Finance, National Research Council, Labour, Energy, Mines and Resources, Environment (Fisheries and Forestry), Agriculture, Secretary of State, Health and Welfare, Immigration, and Indian Affairs and Northern Development.

2 Public Archives of Canada, *Report 1959-1969*, (Ottawa, 1971), p. 2.

3 *Ibid.*, p. 42.

These expectations have not been met. The two years immediately after the passage of the PRO in 1966 did produce a dramatic increase in acquisitions as departments cleared out very old and extensive series of records. By 1970-71 the Records Management Branch estimated that 75 per cent of the records in the departments had been scheduled. In addition, the effect of the Prime Minister's statements on access contributed to the high level of accessions during 1970-71. Nevertheless, subsequent acquisitions have not shown an accelerated or constant rate of transfer; in only three of the eight years since then have accessions exceeded the figure for 1965-66. The regular, continuing transfer of records on a yearly basis has thus not yet occurred and acquisitions have continued to fluctuate substantially from year to year, despite the advent of compulsory scheduling and the Access Directive.

### *1.2 Other Acquisition Methods*

Some records, such as those of Crown corporations and commissions of inquiry, are acquired outside of the records management system because that system does not apply to every government agency. Other records have also been acquired apart from the records management system where that system had not functioned, as for example the records of Indian Affairs field offices. In addition, PRD has acquired large amounts of material under exceptional circumstances. Both External Affairs and National Defence have historical sections and their records schedules and transfer practices reflect the existence of these offices.<sup>4</sup> In 1972-73, Indian Affairs transferred large accessions of records in response to pressure from native organizations and the Indian Claims Commission. In 1978-79, the war diaries for the Second World War were transferred from National Defence largely because space was available in PRD. Some material, such as the 1,250 feet of Corporations Branch records, was transferred to the Division when it should have been sent to the Records Centre because of its high reference use. Altogether, well over 30 per cent of the records in PRD have been acquired by such means outside the normal application of records schedules.

## **2. ADEQUACY OF ARCHIVAL RECORDS IN PRD**

The adequacy of archival records in the Division is a significant measure of the effectiveness of its acquisition methods.

### *2.1 Assessment of Adequacy of Holdings*

The permanent administrative use of records and their present and future research value are judged by archivists when appraising government records to determine which ones will be selected for archival retention. These values are documented in:

- records concerning the creation, implementation, and administration of the acts and programmes of the department. These records contain information on the nature and evolution of policy, the machinery of departmental activities, and

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4 In these two departments, records are retained for historical research as well as administrative purposes, thus delaying their transfer to the Archives Branch. However, it would seem that a more complete record of the activities of these departments is preserved because these offices exist.

their impact on the public. The rights and obligations of that public under the act or programme are also documented. Thus, these records are important for academic research;

- records relating to the internal operations of the agency. These provide information on the sources of authority and ideas, and the methods and channels of decision-making within the agency. Such documentation is essential for understanding the administrative history of the organization; and
- records documenting the organizational structure under which the department or agency operated. These records provide information on the formal means within the agency by which the acts and programmes were implemented and the place in the overall structure of government in which the agency existed at a point in time.

The preservation of these records is essential for the long-term administration of the government, for the citizen to know and protect his rights and obligations, and for the researcher to add to our understanding of society. The adequacy of the documentation held by the Public Archives must be judged in these three major areas.

## **2.2. Successes**

The substantial holdings of the Public Records Division occupy more than 13 miles of shelf space.<sup>5</sup> Certain subject areas have been well documented: state records including Orders-in-Council and House of Commons Sessional Papers; military records including records of the old Department of Militia and Defence and its successor, the Department of National Defence, to the post-World War II period; records of the Immigration Branch; and records of the Dominion Lands Branch. Evidence of the growing value of the Archives holdings is their use by researchers. The first in the new series of PAC *Annual Reports* lists 44,139 volumes provided to researchers and 2,639 microfilm reels borrowed on inter-library loan during 1970-71. The report for 1977-78 lists 74,264 volumes circulated and 6,242 reels borrowed, increases of 68 and 136 per cent respectively.<sup>6</sup>

## **2.3 PRD Archival Holdings of Operational Records: A Case Study of Eight Departments**

In the past, PRD concentrated on acquiring the operational office records of major departments, that is, those included in schedules A and B of the Financial Administration Act (by which the PAC mandate is in effect partly defined). Consequently, one would expect that the Division's archival holdings for these departments would be relatively complete and that gaps would occur only in peripheral areas.

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5 See Public Archives of Canada, Public Records Division, *Historical Records of the Government of Canada*, (Ottawa, 1978), for a description of the Division's holdings. (EDITOR: The revised and expanded third edition is entitled *General Guide Series 1983: Federal Archives Division*.)

6 Figures are for both Public Records and Management Divisions. The number of volumes circulated has been equally divided between Public Records and Manuscript sources since 1975 when separate statistics were first kept.

As a test of the adequacy of Division holdings, archival records of eight representative departments were examined.<sup>7</sup> The adequacy of the documentation is expressed in terms of good, fair, poor, and nil. In arriving at the assessment, archivists considered the extent of archival records documenting organizational structure, internal operations, programme administration, and the time periods covered. For comparative purposes, the findings are expressed as number of offices per department. These offices are all operational, as opposed to those concerned with purely administrative/housekeeping matters. Of the 245 offices in the eight departments, PRD holdings of archival records of only 50 are good (20 per cent); for 86 offices holdings are fair (35 per cent); and for 32 they are poor (13.6 per cent). For 77 offices (31.4 per cent) the Division has no holdings at all. The PRD holdings of operational office records of major departments are decidedly inferior.

#### ***2.4 PRD Holdings of Minister's and Deputy Minister's Offices for Eleven Departments***

PRD holdings of archival records of ministers, deputy, and assistant deputy ministers were assessed for all eleven departments. PRD holds some minister's office records for certain years for only four of the eleven departments.<sup>8</sup> The Division holds some deputy minister's office records for six of the eleven departments for certain years. It holds no identifiable assistant deputy minister's office records for any of the departments, although such records may be scattered on numerous central registry subject files. The Division's holdings of these records are very skimpy. Those executive records in PRD custody constitute valuable archival documentation.<sup>9</sup>

#### ***2.5 PRD Holdings of Crown Corporation Records***

The historical contribution to Canadian life of the Crown corporation has been significant and, as such, records which they create are an important part of the historical record of the Government of Canada. The Public Records Order does not

7 These departments include Forestry, Surveys and Mapping, Finance, Secretary of State, National Research Council, Labour, Immigration, and Agriculture. Three departments — Indian and Northern Affairs, Health and Welfare, and Transport — were excluded from the total of eleven surveyed for parts of this study, as it proved impossible to analyze holdings or schedules for these departments by individual offices. For the departments of Environment, and Energy, Mines and Resources only two representative branches (Forestry, and Surveys and Mapping) were surveyed for the sake of expediency. All surveys were undertaken by the archivists responsible for the records concerned.

8 The Manuscript Division has collected a good selection of personal papers of ministers for the post-1958 period. Some papers contain records of minister's offices pertaining to their departmental functions. In most cases no delineation was made between the records of the office and the papers of the incumbent in these offices, thus no corresponding distinction was made at the PAC.

9 The paucity of PRD holdings of this type of record has been explained in three ways. First such records are not included in the regular scheduling and disposal system for government records. Next, such records needlessly duplicate those selected from central registry files through the normal scheduling process. PRD's few present holdings of executive records disprove this contention. They are substantive in content and easily merit archival retention. An example is the records of the Office of the Deputy Minister of Indian and Northern Affairs, which document the relations of each of the Department's branches with one another and with the outside world, i.e. politicians and the general public. Lastly, these offices do not keep records apart from the department's own registry. However, all minister's offices keep their own registries. Of the six records managers interviewed, four knew of the existence of deputy ministers' files, one did not know, and only one was certain there were no such files being kept.

cover corporations. Some success has been achieved in acquiring records of corporations on an informal basis, but formal agreements for the acquisition of archival records exist for only four Crown corporations out of the 379 which the government owns outright or in which it is a major shareholder (House of Commons Debates, 1 March 1978, reply of President of Treasury Board to Order Paper Questions 1041-1070). The Division holds records for the largest corporation, Canadian National Railways.

### **2.6 PRD Holdings of Other Agency and Departmental Records**

There are many agencies and departments for which PRD holds no records: The Anti-Dumping Tribunal, National Museums of Canada, Atlantic Development Council, Canadian Human Rights Commission, Ministry of State for Economic Development, National Library of Canada, Federal-Provincial Relations Office, Foreign Investment Review Agency, Pension Review Board, War Veterans Allowance Board, and the Law Reform Commission, among numerous others. Many of these agencies are relatively small, were recently created, and are often without adequate records management operations. Major efforts would be necessary in order to acquire their records.

### **2.7 Archival Records in the "System"**

Holdings of archival records in the Public Records Division, the Ottawa Records Centre, and regional records centres across the country were examined for the eleven identified departments; this does *not* include, therefore, potential archival records still in *active* use in their originating departments or stored in some dormant area within the departments. Only 56.6 per cent of the identified archival records are held by PRD; the balance, of which a significant proportion contains early material, is stored in records centres. Moreover, three departments (Environment, Immigration, and Indian and Northern Affairs) have less than 35 per cent of their archival holdings in PRD. These are the same departments with the largest proportions of old records stored in records centres. Four departments (Agriculture, Labour, NRC and Finance) rarely use the records centre at all for storage of archival records. They appear to have a large percentage of their archival records in the Division.

The PRD does not, therefore, have a large proportion of the archival records that should be in the Archives and available for research. These are being held back for supposed administrative requirements (see below 3.2.2, Failings of Records Scheduling). It was pointed out during the authors' interviews with records managers that for certain departments, and particularly those most regionalized, there are significant holdings of archival records in storage which should be in the Archives Branch. Observable evidence from records stored in records centres only serves to reinforce this conclusion.

### **2.8 Summary**

The PRD has achieved some notable success in collecting archival records over the past fifteen years, but it still has a great distance to go. Its holdings of operational records for major departments on which it has concentrated its acquisition activities are seriously incomplete. Many records which should now be available for research remain in the custody of departments in various record centres. PRD holdings of

ministers and deputy ministers' files are very sketchy. The Division has only scratched the surface in its collection of Crown corporation records. The records of many smaller peripheral agencies have not been acquired. Its yearly acquisitions have not gradually increased as was predicted.

### 3. ACQUISITIONS SYSTEMS — THE RECORDS MANAGEMENT SYSTEM

The most important aspect of the acquisition methods and procedures of PRD is the records management system of records scheduling and microfilm submissions. The records of any organization, including government, readily lend themselves to systematization. The modern records management system of the federal government is centred around this concept. The true function of a records office in a government department is to service the organization efficiently, economically, and satisfactorily by systematically providing for the retrieval and preservation of essential information for the agency's use. The fulfilment of this function is only possible through records management. Records management necessitates a sound file classification system, the controlled provision of information from that system to the users in the agency, and the final disposition of the records after the termination of their administrative life. The term, records management, "encompasses the segregation of the papers by pre-determined grouping, to permit retrieval and systematic selection for disposal...."<sup>10</sup> The systematic selection for disposal is one of the essential elements in records management, for the preservation of records in a filing system long past their administrative usefulness retards the true function of a records office to serve its organization efficiently.

#### 3.1 *Records Scheduling: Theory*

The records management tool to accomplish the systematic selection of records for disposal is the Records Retention and Disposal Authority or records schedule. Although the file classification system is an obvious prerequisite for proper records management, an "equally essential element is a comprehensive and continually active scheduling program."<sup>11</sup> The records schedule indicates the value of the records to an organization through the provision of definite time periods for the various stages in the life of the records and the storage location for the records during these stages. In addition, it indicates the final disposition of the records, that is, destruction or retention by the Public Archives. Thus, the schedule becomes a timetable for the records, following them through their active life within the department to the dormant stage at a records centre or a dormant storage area in a department, to their final disposition as waste or as archivally significant documentation. These time periods and storage locations are important aspects of records scheduling because they are the means by which the material is first identified and then eventually "freed" for preservation.<sup>12</sup>

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10 Public Archives of Canada, Records Management Branch, *Records Organization and Operations*, Paper Management Series, (Ottawa, 1975), p. 1.

11 Public Archives of Canada, Records Management Branch, *Records Scheduling and Disposal*, Paper Management Series, (Ottawa, 1975), p. 8.

12 *Ibid.*, p. 9.

### 3.1.1 File Classification Systems

The file classification system and its relationship to the records scheduling aspects of records management are of vital concern to archivists. The degree to which policy files are separated from general files and housekeeping material is separated from operational material is the degree to which documentation cannot only be easily retrieved for current administrative requirements, but also preserved for future research use. The first step in the scheduling process is the creation of an effective file classification system which meets current operational and future research requirements. Where the file classification system is effective, the records schedule and the acquisition methods of the PRD are more likely to be effective.

### 3.1.2 Creation of the Records Schedule

The creation of records schedules made obligatory by the Public Records Order of 1966, is one of the major responsibilities of records managers. It enables the records manager to control the records of the department at both the headquarters as well as the regional and local levels. In order to create a schedule, an inventory of the actual records in the filing system is necessary. Existing schedules are reviewed to determine which, if any, are still applicable. The determination of the records' value, expressed in definite time periods for active and dormant use, is done by the records manager in consultation with users who are also often the creators of the records. In some departments this process takes the form of a records committee. The active and dormant time periods are directly related to the administrative, legal, fiscal, and informational values (primary values) of the record to the department. The determination of the first and the last of these values is often very subjective. These values can be more precisely determined by examining frequency of use statistics. After these retention periods have been settled, the determination of the final disposition of the record is done partly by the creating department and partly by the archivist. The department first selects for permanent preservation by the Public Archives those archival records having potential long-term value (secondary value) to the department. The archivist then broadens this selection to include records that will have significant value to all kinds of potential researchers or to other government agencies and that will document important people, events, or ideas in Canadian history. Once the records schedule is drafted and the required authorizations within the department obtained, the schedule is submitted to the Dominion Archivist for approval. Most schedules are not lists of files against which appropriate time periods are placed but, rather, more general subject groupings by file blocks with time periods placed against types of records such as policy, general, or individual cases within these subject groupings (see 3.2.2.3b).

Officers of the Records Management and Archives Branch review the submitted records schedule to ensure that the suggested retention periods meet all legal and fiscal requirements; that the periods are realistic (not excessively long such as "indefinite"); that the schedule covers the records it purports to cover; that the schedule can be easily and effectively applied to the records; that the schedule relates to headquarters and/or regional and local records; and that the archival records are identified for transfer and preservation at the end of the retention period. The review process results in recommendations being made to the Dominion Archivist for acceptance, modification, or rejection of the schedule. If approved as submitted or as amended, the schedule becomes a formal requirement for a department to retain



records for at least the specified time periods and to dispose of records at the expiry of those retention periods. Although the authority does not require the disposal of the records after the expiry of the retention period and records can be retained for longer periods, “only...a clear requirement for such action can be justified.”<sup>13</sup> Disposal “will normally follow automatically at the end of the stated retention period.”<sup>14</sup> (see 3.2.4e)

Experience in using schedules results in the refinement of the retention periods and the corresponding disposals. Departments wishing to reduce the retention periods are required to resubmit for approval (see 3.2.4e). However, extensions of retention periods do not require resubmission.<sup>15</sup> As the scheduling process is extended to all parts of the organization, the department consolidates its schedules. From this point, the matter becomes one of keeping the system up to date by instituting a reporting system to monitor additions and deletions to the filing systems, a “BF” (bring forward) system for disposals, and an audit system to ensure that all requirements are being met.

### 3.1.3 Selection Tool

One of the main purposes of any records schedule is to function as a tool to determine the value of the various classes, groups, or types of records in a department’s custody. Departments use the schedule to determine the administrative value of these records. Records of considerable administrative value are retained longer than are those of minimal administrative value. For the archivist, the schedule is also a tool for determining the archival values of the department’s records. Ideally, the schedule serves as a selection tool by requiring certain records to be sent eventually to the Archives Branch and by allowing other records to be destroyed directly by the department. Archivists, assisted by the records manager and departmental users, can save substantial time and resources by identifying carefully at the time the schedule is created which records have archival value. Indeed, investigation at this opportune moment is essential, for most records arrive at the Archives in piece-meal groups removed from the context in which they were created. Although some selection may still be required at the time the records are actually transferred to the Archives, this process will be greatly simplified if primary selection has already occurred.

### 3.1.4 Application of the Schedule

The application of the approved and perfected schedule in a consistent manner is “one of the major duties of a records office.”<sup>16</sup> The first application of the schedule occurs in the shift of a record from active to dormant status. Closed files and closed volumes of files for which there is limited reference activity (no more than one reference per foot per month) are removed from the active file registry and placed in dormant storage at the termination of their active retention periods (see 3.2.4l to m). This is done according to a regular and consistent plan of schedule application often

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13 Public Archives of Canada, Records Management Branch, *General Records Disposal Schedule of the Government of Canada*, 3rd Edition, Records Management Series, (Ottawa, 1975), p. 6.

14 *Ibid.*

15 *Records Scheduling and Disposal*, p. 41.

16 *Records Organization and Operations*, p. 70.

using a “BF” system. For departments with a well-run records office, the application will occur within three months after the retention period expires.<sup>17</sup> For departments which use the Records Centres for dormant storage, the resulting transfer is accomplished when there is a sufficient amount of material to form an accession (see 3.2.4b). Accessions of operational records often consist of material varying in age and retention periods and which relate to broad subject areas placed together for ease of reference and recall.

When all reference activity has ceased and the longest dormant retention period has expired, the Records Management Branch requests approval from the department to proceed with a disposal action. If the department agrees, the staff of either the Records Management Branch or the department applies the appropriate schedule to the records. The PRD is notified of a pending disposal at the same time as the department, thus enabling the Division to review any material which is likely to be destroyed. This second application of the schedule occurs in the shift of a record from dormant to “dead” status and the procedure of contacting the department ensures that the original retention periods and disposal arrangements are satisfactory to the department in question. If the department wishes an extension of the retention period in dormant storage “for adequate cause,” the record will be retained by the Records Centre for an additional period of time. (see 3.2.4e).<sup>18</sup>

### 3.1.5 Summary

Ideally, records scheduling offers the archivist an excellent opportunity for systematizing acquisition. The process of creating and approving a records schedule provides the archivist with an opportunity to designate for permanent preservation classes of records and individual files with long-term archival value. The records schedule should be an effective tool in the selection process because the archivist can reduce the amount of material requiring file-by-file examination when the records are finally transferred to PRD. The effective and consistent application of the schedules to headquarters, regional, and local records should provide assurances that “where the records schedules are applied, the valuable and important records will be protected.”<sup>19</sup> Comprehensive records schedules for the records of all departments, the consistent and effective application of these schedules, the use of the schedules as an archival selection tool, and the control of regional and local records through the headquarters schedules can potentially provide an effective acquisition system for PRD.

### 3.2 *Records Scheduling: Practices*

The theory and practice of records scheduling often diverge. An examination of this divergence offers insights into the value of the system as an acquisitions tool for PRD.

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17 *Records Scheduling and Disposal*, p. 35

18 *Ibid.*, p. 36.

19 *Ibid.*, p. 42.

### 3.2.1 Evidence of Success of Records Scheduling

The system has achieved some notable successes. Between 1966 and 1971, the Dominion Archivist approved 373 schedules. During the next five years, 208 schedules were approved; in 1976-77 40 more were approved, for a grand total of 621. Disposals of records by these schedules and by the General Records Disposal Schedule (GRDS) by the Public Archives Records Centre (PARC) during the same period are impressive. The increasing totals in the regions over recent years indicate both the decentralization of government activities and the establishment of regional records centres:

Years	Ottawa PARC Disposals (Feet)	PARC Regions Disposals (Feet)
1966-1971	182,700	60,117
1971-1976	157,267	250,444
1976-1979	<u>46,371</u>	<u>60,552</u>
Totals	386,338	371,113

The records schedules are universally regarded as more than just a disposal instrument. All persons interviewed in the study placed equal emphasis on the schedule's value in enabling users, records managers, and archivists to assign long-term legal, administrative, and archival values to records, and to establish appropriate retention periods for all records.

Some departments in which the records management system works well credit much of their success to cooperation with users in their departments building confidence over a long period of time, and an absence of any coercion. There was an awareness that in an ideal situation confidence, in turn, inspires further cooperation and leads to success in all areas of the programme: classification of records; well-defined, precise schedules with accurate retention periods; prompt application of schedules; responsiveness to change in media format of records and to the use of new, sophisticated techniques in the management of records; awareness of and input into departmental forms management by records managers; and overall use of the records management system by the department. An enhanced awareness of the role of records management and coincidentally of the archival and other values of records and the uses to which they can be put by departmental personnel is an important by-product of such an ideal programme. While no evidence was encountered that such a programme existed anywhere in the Government of Canada, it was encouraging to note that a few records managers were striving towards the major elements of such a perfect system.

A large and increasing proportion of PRD records are received directly from departments rather than through PARC. While some of these direct transfers, particularly the early ones, were of unscheduled or unschedulable records, interviews with records managers confirmed that the bulk of the more recent material being transferred directly is scheduled and that the schedules are being applied. For those departments which transfer records directly to PRD, departmental dormant storage areas are being used instead of PARC. It was mentioned by records managers that as records classification systems and schedules are further refined, long periods of dormant storage may become unnecessary. The experience of the

Department of Finance appears to confirm this theory. While not an unmixed blessing for PRD, the practice of schedule refinement may lead to the earlier transfer of more records.<sup>20</sup>

### 3.2.2 Evidence of Failures of Records Scheduling

Along with some successes in the scheduling of records and the positive effects on PRD acquisitions have come clear indications of failures. These emerged in discussions with archivists, Records Management Branch personnel, and records managers as well as from observable evidence.

It is accepted in theory that records schedules are good and effective instruments for the acquisition of archival records. The present study took the position that this assumption, along with all others, should be tested. If the process of scheduling is a good means of acquiring records, it is worth building on; if not, alternatives should be examined. Appendix I is a case study which, among other things, examines schedules as acquisition tools. Its conclusions establish quite clearly that schedules, where they exist and are properly applied, are an effective means for PRD in acquiring archival records. The system is worth building upon.

There are, nevertheless, indications that the present system does not work as it should. One such indication is the poor holdings in PRD. Some believe that schedules do not yet cover the records of a large proportion of government offices. Appendix II is a case study which examines this thesis. It concludes that records of 36 per cent of the total of "operational" offices have not yet been scheduled; records and filing systems of senior departmental officials are not scheduled at all. The evidence of unscheduled records was corroborated by the statements of six records managers interviewed. Five of the six placed the percentage of records scheduled at between 40 and 90; one would not give an opinion.

Archivists have reported instances where schedules existed, but were not applied. This problem was examined in a study of the disposals of records in storage at PARC for eleven departments. The findings (see Appendix I) showed that in almost 30 per cent of the cases examined schedules were not being applied to records according to the retention period, and PRD was not, at least through the schedule, receiving archival records. However, PRD has received records from 33 of the 51 offices whose schedules were not being applied. We conclude from this that schedules for operational records are not being used in departments in the manner intended by approved records management procedures. We conclude as well that since PRD continues to receive records in spite of schedules not being applied, departments are aware of the existence of PRD as a repository for archival textual records. This bypassing of the schedule in disposing of archival records says little for the utility of many schedules and very little for the regard in which they are held by records managers. Flexibility in the application of the schedule to the records at the termination of the retention period tends to defer transfer decisions. So numerous are the exceptions to the existence of schedules and to their application that the rule seems more honoured in the breach than in the observance. The result is that the whole scheduling system is brought into disrepute.

20 Transfer of records to PRD before they have been for a proper time in dormant storage sometimes results in requests for loan of original files to the department for reference, a practice which PRD is not equipped to handle and consequently discourages.

### 3.2.3 Failure as a Selection Tool

Experience has proven that schedules as they are now constituted are not effective tools in the selection process. Of 10 sample departments, an average of almost 22 per cent of the total records received in the Public Records Division were eventually recommended for destruction. Although selection was not carried out on each accession of records received, of the 94 accessions of records from the 10 sample departments on which selection took place, more than 70 per cent of the records in 38 of these accessions were recommended for destruction. An average of 38 per cent of the records received in these 94 accessions were destroyed.<sup>21</sup>

### 3.2.4 Failings of Scheduling — An Account of the Reasons

Several reasons have been advanced for the failure of scheduling.

- a. Records managers do not have sufficient authority in their departments. This is particularly noticeable in departments where the records management operations have less status and do not operate effectively. For example, in the Department of Energy, Mines and Resources a functional rather than a line responsibility for records management greatly diminishes the effectiveness of the records management operation. This lack of status exists although determined efforts have been made by the PAC to upgrade the qualifications and classifications of records managers. One evidence of this lack of status and authority is that records managers do not have central control of the records of their departments. Records remain scattered throughout departments in the hands of users or in unofficial records systems.

Records managers are the servants of users, are directly responsible to them, and only peripherally to the “central agency,” the PAC. As a result, records managers still prefer to keep records in case a user may want them rather than fulfil their responsibilities to dispose of records not needed for administrative purposes. Thus, while schedules are approved by the Dominion Archivist with a specified retention period in the department, such periods are regularly extended at the whim of users. Some records managers do not consider it their prerogative to question a user’s changed decision. Consequently, the review of the current applicability of the schedule to the records up for disposal is often relegated to a form-letter response instead of a firm analysis of the situation.

- b. Lack of staff is a universal difficulty partially because departmental staff cuts appear to hit records management operations frequently. Records managers use their limited staff in those areas where they are most accountable to their management: the creation and retrieval of files. The drafting of schedules and especially their application, except for bulky housekeeping series, are left until the last, or not accomplished at all.

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21 Figures making it possible to determine which is more cost-effective: thorough selection at the time of creation of the schedule, or selection after the records have been received in the Archives are not available. However, at the rate of 5.83 feet per professional person-day for the selection of these records at the Archives, it cost 1040 person-days to process the 6064 feet of material from those 10 departments. A study of these alternatives seems warranted.

- c. Procedures for updating schedules are not universally understood. Updating is therefore sporadic, and as the filing system expands and contracts the schedules which relate specifically to the file classification system become increasing inapplicable and irrelevant. In addition, schedules are not revised to reflect new formats for information storage such as machine readable and microfilmed records (see f below). Although records managers wish to review schedules regularly, most admitted that this was not done.
- d. The PAC has no review or audit procedure to monitor the creation or application of schedules within departments, and therefore knows only in a general way where weaknesses in these areas exist. Information which does exist at the PAC on the working of the records management system is not properly or regularly exploited. Neither PRD nor the Records Management Services Division (RMS) of the PAC's Records Management Branch systematically review the existence of schedules, their coverage, or their application in departments.
- e. Retention periods are not only applied with great flexibility (to please the users), but are often set unrealistically in the first instance (to satisfy the requirements of the PRO). Retention periods on the schedule and those which are practised are rarely the same, and only infrequently are schedules amended to rectify this disparity. Some records managers believe that retention dates on schedules need not be precise because such dates are only indicators at a particular moment of how long it is anticipated that records will be required in active and dormant storage. The retention period, from this perspective, can be ignored or changed at the whim of the users. Schedules with unrealistic retention periods are sometimes adopted merely as a quick expedient to get records into dormant storage at a records centre (where no unscheduled records are accepted).
- f. A schedule is seldom applied by the same individuals who drafted it. If the schedule is not clear and precise, it cannot easily be applied by a junior clerk. It was universally held by the records managers consulted that the type of schedule designating retention periods on the basis of broad subject description was impossible to apply with any degree of precision. This difficulty further delays the process of systematic schedule application in the department, as it requires more and better qualified staff to make the system work — staff which for the most part is not available. As a result, records are often lumped together, without any selection being done according to the schedule, and sent to PRD for eventual selection there. Archivists and records managers agreed that a schedule must be related directly by file numbers to the existing file block classification in order to facilitate accurate application.
- g. The quality of the file classification system and its ability to differentiate types of records (policy, operational, and housekeeping categories) is a prerequisite for effective schedule application and file disposal. Only two of six records managers interviewed were happy with their own efforts to date in this regard.
- h. The PAC has not been willing to demand compliance from departments to meet their clearly mandated obligations under the Public Records Order. Records managers are aware of this, and some who are embarrassed by lack of support and resources from within their own departments look on pressure from their “central agency,” the PAC, as the only hope of improving their situation.

- i. The RMS and the PRD within the PAC do not now share existing information on new scheduling activities in departments or on the application or lack of application of schedules by departments, nor do they always work together as closely as they might. The PRD does not at present receive information on recalls by departments of accessions or on extensions of retention periods on records stored at the records centres, despite the obvious implications such actions have on the timely acquisition of archival records. The PRD does not actively participate in decision-making with the PAC in regard to scheduling activities of departments. In some cases the Division has not acquired the responsibilities it should have; in others it has not exercised those it already has. The PRD does not have a say in whether or not extensions to retention periods of records stored at PARC should be granted although such decisions clearly affect PRD planning and its ability to fulfil its role of making records available for research. The Division has not participated in decisions on such larger questions as whether a department's schedules are being applied and whether remedial action is warranted.

Archivists have been either reluctant or unable because of time constraints to become involved in the records management systems of the departments for which they are responsible, in spite of the fact that the quality of the archival holdings which they receive is the direct consequence of the operation of that system. Though advice is provided on the long term value of the records and the archivist ensures that appropriate archival limitations are included in any records scheduling authority, the archivist has little input in determining the validity of the specific retention periods or the reasons for any extensions. The initiative for either the first or the second application of the schedule to the records comes from either the records manager in the departments or from officers of the Records Management Branch. The archivist for the most part accepts the department's decision relating to the application of the schedule. Changes, it was believed, are overdue in several respects:

- i. There was a near-consensus that the archivist had a responsibility to ensure that departmental filing systems facilitated the creation and selection of adequate archival records relating to a department's operations. Advice and suggestions on file creation and classification systems by the archivist would ensure adequate documentation at the policy and operational level.
- ii. There was some consensus that the archivist should become more involved during the creation of records schedules, especially in such areas as the assigning of retention periods. Such early involvement, including the identification of archival records, would obviate the current practice of a department submitting a prepared schedule and the archivist having to rewrite archival limitations, or sometimes rewrite the whole schedule in order that the limitations are clearly delineated. One archivist predicted that, if archival limitations were identified early in the process, active and dormant retention periods on those records could be shortened considerably, because departments would be aware that records of long-term value to them would be stored permanently in the Archives Branch.
- iii. There was a consensus that archivists should be more precise and forthright in delineating archival limitations. Such precision might necessitate the return of

some schedules to departments with a request that the resubmitted version describe the records more accurately. One records manager suggested that archivists be more questioning and be less willing to accept archival limitations already set by departments (see 3.3).

- iv. More time spent by archivists during the creation of schedules in indicating archival values would eliminate much of the file-by-file selection work now undertaken when the records arrive in PRD, since the amount of material transferred on selective retention would be reduced by identifying on the schedule more material for permanent as opposed to selective retention. Where the perspective of time is necessary to judge archival value, the process of selection after transfer may still be necessary. However, for most records, a thorough investigation at the time of schedule creation (when a file can be assessed in the context of all the records created) will normally enable the archivist to select the record then for permanent preservation.
- k. There are no uniform retention periods within accessions in dormant storage at PARC. Accessions of operational records most often consist of material varying in age and retention periods and relating to broad subject areas placed together for ease of reference and recall. It is difficult to accept that records for the nineteenth century and the 1970s are required equally for current administrative purposes. The retention periods indicated by the schedule are not used to determine when individual files or file subject areas must be transferred to PRD. Rather, only when all, or major portions, of the total accession have exceeded the longest retention period of any one file does the transfer occur. For example, an accession of one thousand boxes may contain a few files dating to 1977; a twenty-year retention periods means the *entire* accession would not be transferred to PRD until 1997, despite the fact that over 90 per cent of the accession predates 1945 and that no small part of it was nineteenth-century material. This practice enables a department to postpone transfer of records to the PRD indefinitely.
- l. Files are not closed off after the lapse of a sufficient period of time in order to permit their disposal. Such "open ended" files can remain so indefinitely, and consequently they are never transferred to the Archives. Land title files are a good example.
- m. Current suggested practice is that volumes of a file should be closed at the termination of the transaction, the termination of some significant event, or the attainment of a certain size. However, in numerous instances, files are not considered available for transfer until *all* volumes are closed and the last volume becomes eligible under its retention period for transfer. Retention periods on schedules in these cases have no meaning whatsoever, as they relate to the total file.
- n. As the archives of all departments, the Archives Branch should take custody of all departmental records of permanent administrative, legal, or other value once their immediate administrative use to departments has expired. In practice, PRD has not properly defined nor has it adequately performed this role. Records of permanent value to departments are stored in dormant storage areas in the departments themselves or in PARC.



### 3.2.5 Summary

The scheduling of records as practised in the federal government since 1966 has had some notable success, principally in the disposal of massive quantities of routine records and the establishment of minimum retention periods. Schedules when properly designed and applied are good acquisition instruments for PRD. However, the scheduling system as currently practised is ineffective in acquiring archival records for the Division. Schedules cover the operational records of the government only in a very piecemeal fashion and, even when in place, they are poorly applied. Schedules do not cover ministers' or deputy ministers' office records at all, nor those of many peripheral agencies. The PRD can count on receiving only fragmentary archival records as a result of the current operations of this system.

### 3.3 Regional and Local Records<sup>22</sup>

In theory, for records management purposes, regional and local offices of federal departments are supposed to be microcosms of their Ottawa headquarters. The file classification system and the retention and transfer provisions of records schedules used by headquarters are to be applied in the regions. The Public Archives has established records centres across Canada to store the dormant records created in the regions; "dead" archival records in the regions under the provisions of the records schedules, are to be transferred to the care and custody of PRD after the expiry of their retention periods.

In practice, this system has not worked. The Division has received very little regional material as a result of the records management system. Between 1965 and 1978 for the eleven departments surveyed, only 530 of 17,022 feet of material were acquired from regional and local offices of these departments. Virtually all of this figure (516 feet) was transferred solely from the Department of Indian and Northern Affairs, largely as a result of archival surveys of Indian Affairs field offices undertaken by divisional staff in cooperation with the department, and not as result of schedules. It is often contended that the reason for the lack of material from the regions is that regional records are routine in nature and merely duplicate the important material on the headquarters' files. Actual observations do not support this contention. Comprehensive surveys of regional records in dormant storage in the Regional Records Centres undertaken between 1976 and 1978 identified 9,342 feet of records having potential archival value. To this must be added an additional 530 feet of Indian Affairs field office records which are currently stored at the Ottawa Records Centre.

For such departments as Environment, Indian and Northern Affairs, Energy, Mines and Resources, Immigration, Health and Welfare, and Transport, the extent of archival material in the Regional Records Centres constitutes a major proportion of archivally significant material identified as existing in the records management system. Fully 15 per cent of the archivally valuable material either in PRD or in dormant storage at records centres is generated and stored at the regional level. In spite of the existence of the records management system, its supposed applicability

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22 For a more detailed examination of some of the problems relating to the acquisition of regional and local records, see Public Records Division, Committee on Acquisition and Access Policy, *Report: Acquisition and Control of Field and Regional Office Material*, August, 1976.

to regional records, and the existence of the Regional Records Centres to aid in the identification of this material, why have so few regional records been acquired by PRD? The interviews conducted for this study revealed some of the answers. (Four of the six records managers interviewed are from departments which have regional and local offices).

- a. Although the headquarters' file classification system is used in the regions, the regional users needs are different; therefore, the contents of the files are quite different. Retention periods which are valid for headquarters are usually invalid for the regions.
- b. Records management in the regions has even less priority and status than at headquarters. Records management duties are often assigned to junior staff members or to staff members with other responsibilities who lack sufficient training and familiarity in records management to modify the file classification system, correct the retention and disposal information, and apply the records schedules.
- c. Space considerations and other factors which may force records disposals at headquarters are often not important in the regions.
- d. Although functional control exists in some cases, none of the four records managers who work for departments with regional offices have direct control over the creation, maintenance, or disposal of files in the regions. Records staff in the regions report to supervisors displaying no interest in or knowledge of records management, and not to knowledgeable officers at headquarters.
- e. The Records Management Services Division, the Micrographic Advisory Services (except in Toronto), and PRD do not offer comprehensive services or even advice to the regional offices.
- f. In spite of the decentralization of policy-making authority to the regions, records management there has not been a major priority for headquarters records management personnel. Insufficient time, lack of staff, and the absence of authority for regional records management ensures that regional records will never become a priority for headquarters records managers.

The PRD does not acquire archivally significant regional records in a comprehensive and consistent manner because the records management system does not function properly in the regions. The little material that is transferred is not acquired through the system, but outside of it.

#### **4. ACQUISITION SYSTEMS — MICROFILM SUBMISSIONS**

Microfilm submissions are part of the records management system, and PRD acquires records as a result of submissions. Between 1966 and 1977, 295 microfilm submissions were processed. From 1965 to 1979, the Division received 5,084 microfilm reels from departments. Most of this material came from the Department of National Defence (1339 reels), the Chief Electoral Officer (920 reels), the Dominion Lands Branch of the former Department of the Interior (828 reels), Indian Affairs (257 reels), and the Registrar-General (185 reels). The filmed material includes the central registry files of the Department of National Defence covering much of the security classified material created and received by that department

during the Second World War (the originals were destroyed), electoral lists, and the original Letters Patent issued to homesteaders in Western Canada. Thus, microfilmed records constitute an important part of the holdings of the Division and the processing of the submissions is an important part of the archivist's acquisition work.

#### **4.1 Advantages**

Microfilm enables the PRD to acquire large quantities of material in an economic format which saves archival storage space, permits the duplication and distribution of information through sale or Interlibrary Loan, and ensures the security of the information. As microfilm is relatively inexpensive to reproduce, records in a film format can still be retained by the departments for long-term administrative purposes and a copy can be made available to the Archives for research purposes.

#### **4.2 What is Filmed**

With few exceptions, such as the Department of National Defence, most microfilm applications concern records which are bulky, routine, and repetitive such as case files, lists (eg. voters), raw data (water levels and weather reports), and forms (Letters Patent). Most departments do not microfilm central registry operational and policy files. In spite of the security needs of a department to ensure the preservation of information essential to its continued administration, microfilm has not been used for this purpose to any great extent. Where it has, such as for the filming of survey records, immigration case files, and citizenship registration files, the original films are not transferred to the PRD for preservation, but are retained on permanent retention at the Ottawa Records Centre.<sup>23</sup>

#### **4.3 Approval Procedure**

Once a departmental microfilm submission is received in the Public Archives, officers from the Records Management Branch, the Archives Branch (usually PRD), and Micrographic Advisory Services investigate and confirm the reasons for the submission, its technical and economic feasibility, the archival value of the records, and the proposed disposal of both the original record and the film. Since a submission for a microfilm project involves only a recommendation from the Dominion Archivist and not an approval (in this respect it differs from a records schedule), a rejection of the proposal does not necessarily prevent the department from proceeding with the project. However, the proposed disposal action for the original records and the microforms becomes a formal, binding authority and supercedes any previously existing records schedule relating to these records.<sup>24</sup>

#### **4.4 Observations**

a. Microfilm submissions do not result in the acquisition of extensive groups or series of records by PRD. However, what has been acquired has been important.

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23 Of the 74 microfilm accessions at PARC for the 11 departments surveyed, 73 were on "permanent" or "indefinite" retention.

24 *General Records Disposal Schedule*, p. 102. There was considerable confusion on this matter by the archivists and records managers interviewed.

- b. Archivaly significant material is not usually filmed.
- c. The question of whether a copy of the microfilm alone would be preferable to the retention of the originals has not yet been answered by the PRD. (One records manager suggested that PRD should be scheduling information and be less concerned about whether the material is in hard copy or film).
- d. Although the proposed disposal action, if approved, becomes a formal scheduling authority, records managers hold this aspect of the submission to be no more binding than records schedules. They contend that flexibility is required for disposal of microfilm as with paper records.
- e. Although a microfilm submission amends a schedule, the records schedule is rarely amended formally to reflect the new retention and disposal information for the hard copy.
- f. Regional or local offices do not seem to use the microfilm submission procedures to any great extent. Perhaps little filming is done there, although one records manager was aware of extensive filming being done in the regions. The remainder were uncertain.

## 5. OTHER ACQUISITION METHODS

Unscheduled records, or those from departments where schedules are not applied, are often acquired. In our case study of eight departments, PRD received records from 35 of 88 offices whose records were unscheduled (see Appendix I). A programme to acquire records of commissions of inquiries is also in existence. Agreements have likewise been negotiated with a few Crown corporations. In addition, archivists make contacts with agencies that are not required to schedule their records, or with departments, agencies, and programmes which are being disbanded. Contacts in these instances are most often made directly by archivists to records managers, users, or the appropriate managerial authority in corporations. Such contacts are solicited by archivists, result from referrals by records managers or Records Management Branch personnel, or are received directly from the agencies and corporations.

Surveys of PARC holdings of archival records have been undertaken by PRD. Determination of the extent of holdings for planning purposes has been the prime reason for the surveys. However, the concomitant identification of outstanding accessions, especially those containing very old records, often results in special efforts being made to acquire records. Potential archival records have also been identified in surveys of regional record centres during 1976-78. The centres have been asked to advise the PRD of disposals of these records. New material received by the centres in the interim has not been surveyed.

### 5.1 Successes

Excellent records have been received and continue to be received by these essentially *ad hoc* methods (see Section 2 above and Appendix II). As no scheduling is required, records managers like the expediency of direct transfers for disposing of dead records. Traditionally, unscheduled records from offices of individuals (see Appendix I) and other records which are not in the records classification system are

acquired in this manner; these records might not be otherwise acquired. In some cases when operations become defunct, records of such operations come to PRD as a cohesive unit, facilitating their selection and description by archivists.

### **5.2 Failings**

Some procedures to acquire records of commissions, to store and use information gleaned in records surveys, and to acquire records of defunct agencies have been adopted. However, the possibilities of systematizing a “non-system” are limited. Inconsistencies in PRD approaches and in departments’ responses will remain a part of an *ad hoc* procedure. Information on departmental holdings of potentially archival records supplied by users or other interested persons will always be incomplete, because no particular official in the department has the responsibility for relaying it to the Archives. A fragmented and partial archival record is the inevitable result. Surveys of record centres to gain knowledge of archival records give only a limited, and increasingly smaller, picture of archival records outside of PRD. Moreover, such “other” or exceptional acquisition methods are labour-intensive and time-consuming for PRD in comparison with the use of the records management system. A schedule is by nature a contract over time; it need be reviewed only occasionally. The *ad hoc* approach requires that each individual contract must be renewed for each new body of records, and that new contacts be developed with personnel changes in departments and in PRD.

The orderly disposal of files by scheduling follows naturally from other records management functions such as file classification. The ability to schedule and dispose of records in an orderly fashion is in fact offered as a justification for file classification (see 3.1). Neglect of such an integral component of the records management system as scheduling may lead to loss of support or weaknesses in the system as a whole. Consequently the archivist would have to perform the arduous and near-impossible task of selection from and description of poorly organized and unclassified records.

### **5.3 Summary**

Maintenance of strong and effective records management programmes by departments and the use of archival limitations on schedules as an acquisitions tool whenever possible is of fundamental importance to PRD, particularly when compared with the unattractive alternatives. If this system operates well, other acquisition methods need be used only for records which are not required to be scheduled.

## **RECOMMENDATIONS FOR CHANGES IN THE RECORDS MANAGEMENT SYSTEM**

The records scheduling system envisaged by the passage of the Public Records Order is not yet completely in place and, where it is, it is not working as effectively as it should. The quality and extent of holdings of archival records in the Archives Branch are being detrimentally affected as a result.

Fundamental modifications to records scheduling practices will ensure the acquisition of a quality archival record. Recommendations 1 to 5 below outline what

must be done to install the scheduling system and make it work. Recommendations 6 to 11 describe means by which these are to be carried out. Recommendations 12 to 14 are a method of ensuring that the system continues to function once it is installed. Recommendations 15 to 17 are intended to ensure that records created under special circumstances are brought under control.

The following recommendations are based on the assumption that the PAC will be given or will find the requisite resources to fulfil its mandate. Should these recommendations be adopted, a thorough resource requirements study will be necessary.

Recommendations 1, 2, 4, 10, 12, 13, 15, and 16 are to be implemented by incorporation into a revised Treasury Board *Administrative Policy Manual* and a new Archives Act.

### **Recommendation 1 — Comprehensive Scheduling**

- 1.1 that the inventorying and scheduling process for all government records be completed as soon as possible, to meet the requirements of access, privacy, and archives legislation.
- 1.2 that in giving effect to the prior recommendation, all schedules dated prior to 1 January 1966 shall be reviewed and resubmitted for approval by 31 December 1981.
- 1.3 that the term “public records” be changed to “government records” and that the definition of “government records” in a revised *Administrative Policy Manual* be inclusive of the following categories of records in addition to those already covered in the existing Public Records Order:
  - i. Records of the offices of deputy ministers and executive officers of departments
  - ii. Records of the offices of ministers

and that an amendment to the *Records Management Guide for Minister's Offices*, (PAC, Records Management Branch, 1978) serve to better delineate “personal” from “departmental” records in minister’s offices, and that the Archives and Records Management Branches devise standards for disposing of minister’s office records.

- 1.4 that the definition of government records in a new Archives Act be inclusive of the following categories of records in addition to those already covered in the existing Public Records Order:
  - i. Records as described in i and ii of the clause immediately preceding
  - ii. Records of Crown corporations.

### **Recommendation 2 — Application of Schedules**

- 2.1 that after 31 December 1981 government records referred to in an operational records schedule approved by the Dominion Archivist shall be disposed of in accordance with that records schedule.

- 2.2 where records cannot be disposed of in accordance with the records schedule, departments shall secure the formal approval of the Dominion Archivist for the extension of the retention periods concerned by submitting a revised records schedule.
- 2.3 that a department may amend an existing records schedule by submitting such amendment for formal approval to the Dominion Archivist.
- 2.4 that the approval of an existing records schedule may be revoked by the Dominion Archivist.
- 2.5 that after 31 December 1981, departments shall review and resubmit all existing records schedules for the approval of the Dominion Archivist at least once every five years.
- 2.6 that departments should be encouraged to transfer, where practicable, a copy of archival microfilm and EDP records with supporting documentation to the Archives Branch as soon as possible after creation of the records.
- 2.7 that in order to facilitate the appraisal and acquisition of EDP records the following provisions of the Access Directive be inserted in the *Administrative Policy Manual* as article 440.7.7:

*Transfer of Records to the Public Archives*

- a) To facilitate research all departments and agencies should transfer their records to the Public Archives of Canada as soon as practicable.
- b) Every department shall apply the schedules and standards issued, established, or approved by the Dominion Archivist pursuant to paragraphs 7 (d) and (e) of the *Public Records Order* and, subject to subsection (4), transfer to the Public Archives in accordance with such schedules and standards all records in its possession.
- c) A record that has been identified as having long term value and is machine readable should be transferred to the Public Archives with its supporting documentation as soon as possible to ensure its long term retention.

### **Recommendation 3 — Regional Records**

- 3.1 that the PAC ensure that the records management system be properly implemented for regional and local records, through departmental records managers, by establishing PAC representation from Records Management Services, Micrographic Advisory Services, and Archives Branch in the regions.

### **Recommendation 4 — Conversion of Records from One Medium to Another**

- 4.1 that the approval of the Dominion Archivist be secured by departments before conversion of records from one medium to another and that such approval constitute a retention and disposal authority.
  - i. that recommendation 4.1 be applied immediately to all microfilming of records.

- ii. that, following Treasury Board approval of recommendation 4.1 above, the PAC implement as soon as possible recommendation 4.1 to apply to all other records medium conversion (paper to EDP, film to laser imprinted video, etc.).
- 4.2 that the Archives Branch determine the types of records for which the retention of the new storage medium is adequate, thus permitting the destruction of the original records.

### **Recommendation 5 — Development of Standards**

- 5.1 that archival and records management interests together develop records management standards for the records inventory and records classification and scheduling activities of departments, incorporating changes from existing practices as deemed appropriate.

### **Recommendation 6 — Implementation of Standards**

- 6.1 that the Dominion Archivist ensure that standards established (Recommendation 5) be properly implemented in departments.
- 6.2 that the responsibility for ensuring that this happens is to be exercised on behalf of the Dominion Archivist by officers of the Records Management Services Division, Records Management Branch, with the participation of the Archives Branch, by their assistance in the implementation of these standards within departments and as long thereafter as necessary to ascertain that such standards are being met.

### **Recommendation 7 — Archives/Records Management Branch Coordination**

- 7.1 that the Archives and Records Management Branches develop mechanisms to better coordinate their activities, ensuring a joint archival/records management perspective in all Public Archives' activities with departments, including records classification and scheduling.

### **Recommendation 8 — Archives Branch Participation**

- 8.1 that the Archives Branch participate more directly in the systematic acquisition of records:
- i. by archivists taking an active role in those aspects of schedule creation and application and in those aspects of file creation and classification and the creation of records inventories which impinge on the identification and transfer of archival records.
  - ii. by defining more precisely PAC responsibilities for acquiring records of Crown corporations and other quasi-independent but government owned or supported agencies and organizations, and by developing procedures for acquiring records of any such agency or organization not required to schedule its records under the provisions of a revised Archives Act but which fall within these defined responsibilities.



- iii. by outlining means by which the PAC can support a Crown corporation not included in schedules of the Access to Information or Privacy Acts in establishing its own archives and defining the level of such supports where applicable.

### **Recommendation 9 — Access to Departmental Records**

- 9.1 that a new Archives Act provide for access by staff of the Public Archives to any record of government to which access is required for official purposes, and that the Department of Justice, which is responsible for drafting and amending acts, ensure that the name of the Public Archives appears in acts where access to records is restricted to certain departments.

### **Recommendation 10 — Training**

- 10.1 that more formal training in records management be offered to government records archivists in the Archives Branch, and that consideration be given to broadening archival training to include such topics as selection criteria and administrative history, and that training in archival practices and procedures be offered to officers in the Records Management Branch.
- 10.2 that records staff in departments be trained in the responsibilities of the Archives and Records Management Branches.
- 10.3 that a new guideline be inserted in the *Administrative Policy Manual* (440.7.4.3): “departmental records management personnel should avail themselves whenever possible of training opportunities in the area of EDP fundamentals and EDP records management.”

### **Recommendation 11 — Reporting by Departments**

- 11.1 that data relating to the collection, creation, access, use, retention, and disposal of information to be compiled in a proposed automated central inventory for use in the implementation of Access to Information and Privacy legislation (the federal register and privacy index) be made available to the Public Archives for use in its role as a central agency responsible for records management activity in the federal government.
- 11.2 that, if and when necessary, the Public Archives supplement the information thus gained by requiring that additional information be supplied by departments, in particular:
  - i. detailed descriptions of total records holdings by filing system.
  - ii. indication by office of all scheduled and unscheduled records.
  - iii. information on any new schedules created.
- 11.3 that where deemed appropriate the Dominion Archivist will audit a department's records management activities.

### **Recommendation 12 — PAC Report to the Treasury Board and the Auditor General**

- 12.1 that the information collected through implementation of Recommendation 11 be used by the PAC to prepare an annual report to the Treasury Board,

with a copy to the Auditor General, outlining departments' records management activities and their impact on the creation and disposal of archival records, and recommending that appropriate remedial action under the authority of the Treasury Board be instituted by departments whose activities are found to be deficient.

### **Recommendation 13 — Information System**

- 13.1 that the Records Management and Archives Branch examine the feasibility of collating in an easily disseminated format all information required now, and as a result of the implementation of these recommendations, on the records management activities of departments, and on records in storage in the PAC Regional Records Centres, and that this system be comparable (technology and information content) with existing or projected information systems in either Branch.

### **Recommendation 14 — Public Archives and Legislation**

- 14.1 that changes in legislation, regulations, and directives which would impinge on the activities of the PAC be monitored on a regular and continuing basis.

### **Recommendation 15 — Records of Special Commissions and Boards**

- 15.1 that the Department of Justice ensure that an article similar to the following be included in any act of Parliament creating special boards or commissions of limited duration: "Upon termination of this Act, all records as identified in Chapter 460 of the *Administrative Policy Manual* created or acquired under the authority of this Act shall be deposited under the care, custody, and control of the Dominion Archivist within ten working days of the termination date. The Dominion Archivist shall within ninety days upon having received said material submit a proposal to the Governor-in-Council stating which records are recommended for destruction, which records are to be transferred to other government agencies and under what conditions, which records having been judged as possessing historical value are to be recommended for retention by the Public Archives, and what access and release policies are recommended subject to the Canadian Human Rights Act and other pertinent legislation."
- 15.2 that records created by departmental commissions established under Part II of the Inquiries Act (*RSC*, I, 13) be received by the records manager of the responsible department or agency, maintained intact as a distinct entity, and scheduled through established procedures.

### **Recommendation 16 — Records Created Under Private Contract**

- 16.1 that records produced under contract be received by the records manager of the responsible department or agency for scheduling through established procedures by including a directive in Chapter 312 of the *Administrative Policy Manual* requiring the insertion of the following clauses in each contract:

1. Copyright in any copyright work rests in Her Majesty but in any publication of such work by or on behalf of Her Majesty the contribution of the contractor and of the author shall be acknowledged.
2. Ownership of any model, prototype, pattern, sample, or other record as defined in Chapter 460 of the *Administrative Policy Manual* and produced by the contractor in performing the contract shall rest in Her Majesty. The contractor shall keep a record of everything mentioned in this subsection and account to the minister therefore.

### **Recommendation 17 — Records Created Under Joint Federal-Provincial Programmes**

17.1 that the Public Archives examine the means by which records created under joint federal-provincial studies and programmes may be taken into the custody of the relevant federal department or agency and appraised for archival value by the Public Archives, or jointly by the Public Archives and the respective provincial archives. This might be accomplished by participating in the current Department of Justice/Solicitor General/provincial attorneys-general consultations on the question of information exchange, with a view to establishing procedures.

## **APPENDIX I**

### **Case Study: Effectiveness of Scheduling as a PRD Acquisitions Tool**

#### ***Purpose***

It has been widely accepted that the existence of schedules and their proper application will result in the receipt of good archival records by PRD, i.e., that scheduling properly used is an effective acquisitions tool. This study is designed to test the validity of this thesis.

#### ***Method***

- A. The eight selected departments were again the subject of scrutiny. PRD holdings of records for offices whose records are covered by schedules were compared with holdings for offices not covered by schedules.
- B. It is evident that schedules must be applied in order to be useful, i.e., PRD will not receive records by means of schedules until such application has occurred. For the eight departments surveyed, archivists assessed first how well schedules had been applied and, secondly whether PRD holdings for those offices whose records are scheduled came to the Division as a result of the application of the schedule or by some other means.

#### ***Findings***

- A. The findings of Part A of this study, presented in Table 1, are as follows:
  1. 151 of the 155 offices whose records are scheduled have archival limitations, and PRD should have received records according to those limitations. For

only 33 of the 151 offices (21.7 per cent) are PRD holdings good, for a further 80 (52.7 per cent) they are fair, for 20 (13.1 per cent) poor. For 19 of these offices (12.5 per cent) PRD has no records at all.

2. PRD should, because of the dates of the offices, have received archival records for 88 offices which are not covered by schedules. For only 17 of these offices (19.3 per cent) are PRD holdings good, for 6 (6.8 per cent) they are fair, and for 12 (13.6 per cent) poor. For the remaining 53 offices (60.3 per cent), PRD has no records.
3. Expressed in tabular form, these percentages are as follows:

	<b>Holdings</b>			
	<b>Good</b>	<b>Fair</b>	<b>Poor</b>	<b>Nil</b>
Scheduled Offices	21.7	52.7	13.1	12.5
Unscheduled Offices	19.3	6.8	13.6	60.3

For 60.3 per cent of offices for which schedules do not exist, PRD has no records at all; in contrast PRD has no records for only 12.5 per cent of offices for which schedules do exist. Though the percentage of good holdings for both scheduled and unscheduled offices is similar, almost all of the good unscheduled office holdings result from the acquisition of records of defunct agencies which transferred their records *en masse* to the Division.

**B. The findings for Part B of this study, presented in Table 2, are as follows:**

1. For 51 of the 151 offices or 33.7 per cent, schedules were not applied, i.e., archival records were not received as the result of the schedules. Furthermore, schedules were poorly applied for an additional 30 offices (19.9 per cent).
2. In all cases where schedules have been well or fairly well applied, PRD holdings are good or fair.
3. Of the 51 offices on whose records the schedules have not been applied, PRD has no records at all for only 18 of them. Thus, in spite of the fact that these departments have been unwilling or unable to apply the schedules, PRD has received at least some records for the other 33 offices. Some of these records came to PRD before schedules were adopted for these offices, and no additional records have been received since. (This suggests that in some cases scheduling may actually inhibit the acquisition process.) However, many other offices simply transferred files to PRD in large blocks and without any systematic application of the schedules when programmes were abandoned or premises vacated. In these cases, retention periods as specified were completely disregarded in the disposal of the records.

**Conclusions**

1. While the existence of records schedules alone does not guarantee that PRD will receive archival records, the Division is more likely to receive such records from an office whose records are scheduled than from one whose records are not. As a result of PART A of this case study, it is apparent that the records schedule is a **useful** acquisition tool. Part B of this study supports and adds substance to this conclusion. In all cases where records schedules exist and have been properly

ACQUISITION OF FEDERAL GOVERNMENT RECORDS

**TABLE I**  
Adequacy of PRD Holdings as a Function of the Existence of Schedules

	Total No. of Offices	No. of Offices with Schedules				No. of Offices with Schedules but no Archival Limitations				No. of Offices without Schedules			
		Adequacy of PRD Holdings				Adequacy of PRD Holdings				Adequacy of PRD Holdings			
		Good	Fair	Poor	Nil	Good	Fair	Poor	Nil	Good	Fair	Poor	Nil
Forestry	18				2	1				15		9	6
Surveys and Mapping	7				2	1				4			4
Finance	21	18			2					1			1
Secretary of State	60	5	32		4					17			17
National Research Council	20	7	4		1	1				13	1		12
Labour	42	7	4	6						25	5	3	
Immigration	10		10										
Agriculture	65	3	30	9	10					13			13
Totals	243	33	80	20	19	4				88	6	12	53

**TABLE 2**  
**Comparison of the Degree of Application of**  
**the Schedules to the Quality of PRD Archival Holdings**

Quality of PRD Holdings (No. of Offices)	Well Applied	Fairly Applied	Poorly Applied	Not Applied
GOOD	24	6		3
FAIR	3	36	23	18
POOR		1	7	12
NIL				18

applied, PRD has a good archival record.<sup>25</sup> If used as intended, the scheduling process is a very effective means of acquiring archival records. Therefore, for the acquisition process to be more effective, the scheduling process started in 1966 must be completed.

2. Departments are appallingly negligent in the application of schedules to records. The creation of schedules and the proper delineation of archival values is obviously no guarantee that archival records will be received, as departments are not applying the schedules as intended. This is a serious concern for PRD.
3. The fact that PRD has received records of 33 offices whose records are scheduled, but not as the result of the application of the schedules, says very little for the value of the scheduling mechanism as a disposal instrument in the eyes of departments. In a great many cases, records managers choose to bypass the schedules when disposing of records, at least of archival records. Schedules may indeed exist, but their value in the eyes of records managers, if common practice may be taken as an indicator, is far from what it theoretically should be. Departments are, however, apparently aware of the existence of PRD and its role, as numerous records have been forwarded quite apart from the schedules.

## APPENDIX II

### Case Study: Coverage of Departments by Schedules

#### *Purpose*

To determine how adequately offices in departments are covered by records schedules.

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25 This does not of course necessarily indicate that the schedules have been applied when they should have been, (at the end of the retention period for the records), but only that when applied they have worked well.

### Method

Archivists responsible for the acquisition of records from the eight departments indicated on the attached table compared the offices of these departments with existing records schedules. They were asked to indicate how adequately the schedules covered the offices. Operational, administrative/housekeeping, and senior departmental offices were examined separately in the study.

### Findings

1. Departments have numerous operational offices whose records are not covered by schedules. Eighty-eight of 216 operational offices, or 40.7 per cent of the total, were not covered by schedules. While the Departments of Finance, Labour, and Immigration have a very high percentage of their offices covered by schedules, the record for the NRC, Forestry, and the Surveys and Mapping Branch of EMR is dismal indeed.
2. In the assessment, the schedules fared quite well in their coverage of the records and activities of these offices, as 78 covered the records well, 63 fairly, and only 12 poorly.
3. The schedules for "administrative" offices of all 11 departments were surveyed. Finance, personnel, materials and supplies, and some technical and EDP services occupied the activities of 163 offices for these departments. While normally scheduled under the GRDS, the records of 108 of the 163 offices were also covered by supplementary "operational" schedules. In the case of one major department, Indian and Northern Affairs, the GRDS was found to be inadequate, and substantial amendments by the department were made to the schedule.
4. In addition to the 11 ministers and deputy ministers offices for those departments, there are currently 54 senior deputy and assistant deputy ministers' offices. There are no continuing schedules for any of these offices.

**TABLE 1**  
**Number of Offices Covered by Schedules and Degree of Coverage**

	Total Number of Operational Offices	Number of Offices with Schedules	Coverage		
			Well	Fair	Poor
Immigration	10	10		10	
Labour	17	15	11	3	1
Surveys and Mapping	7	2		2	1
Finance	21	20	20		
Secretary of State	60	43	16	27	
National Research Council	20	7	4	3	
Forestry	18	3		1	2
Agriculture	65	52	27	17	8
	218	152	78	63	12

### *Conclusions*

1. While departments have made some progress, they still have a distance to go to achieve the ideal situation where 100 per cent of their operational records are scheduled. This situation, it should be remembered, was to have been achieved ten years ago.
2. The wide variance in the relative success departments have achieved in scheduling their records suggests very strongly that there has been very little pressure from the "central agency," the PAC or, if there was such pressure, it has been ineffective. Those departments inclined to support records management operations have moved forward; the remainder have not.
3. Though some efforts have been made to schedule records of executive offices, these have been ineffective. It is probably not surprising that little success has been achieved: records managers are well aware that there is a great deal of scheduling work remaining in other areas of their departments, and personnel in these other areas are for the most part easier to work with; the records are not extensive and therefore do not present problem of space or control; and PRD, which, given the very high archival potential of such records, might have pressured departments to schedule records has not done so.