

Beyond Ottawa's Reach: The Federal Acquisition of Regional Government Records

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While regional government records have always been within the official mandate of the National Archives of Canada, that mandate has rarely been fully exercised. Indeed, until the past decade, a regional records acquisition policy at the National Archives was conspicuous by its absence — despite the creation of valuable federal government records outside Ottawa ever since the late nineteenth century. This article will explore the reasons behind new initiatives at the National Archives in establishing a regional archival programme. It will conclude with a case study of a regional records survey and macro-appraisal carried out in the Yukon in 1989.¹

The National Archives definition of a regional record is any record created by an office of the government of Canada outside the National Capital Region. The definition explicitly excludes the records of national headquarters located in the regions, such as the Department of Veterans Affairs in Charlottetown or the Canadian Wheat Board in Winnipeg. Regional records are created both in large regional offices and in smaller local or field offices, as a result of the decentralization of a department's headquarters operations. The placement throughout the country of such offices of select federal agencies (national parks, experimental farms, prisons, customs houses) has been a long-standing practice of Canadian governments since Confederation. However, since the 1960s, there has been a dramatic increase in the number of regional offices and in the nature of their operations. This has occurred because of the deliberate decentralization of federal government services, including certain decision-making powers, in order to bring government closer to the people it serves across the country. Regional offices have become, in effect, regional headquarters and often are not only responsible for the implementation of headquarters-based directives, but also create policy that is specific to the region in which they operate. As a result, over the past twenty-five years, some regional offices now initiate and carry out policy decisions that are not dictated by or even duplicated in Ottawa. Needless to say, the records of such offices have assumed a directly proportional increase in archival value.

There are many types of records created at a regional office. They include the usual correspondence between that office and headquarters, as well as duplicates such as headquarters' policy directives and circulars, final reports or surveys carried out in the

field but forwarded to Ottawa. As already noted, however, there is today a growing number of regional records that are unique. These records often consist of responses to local situations by the field office or regional headquarters and, as a result, document more fully federal government operations in a region. In addition, there are cases where procedures adopted to solve unique problems in a region, or original research carried on in regional establishments, influence the nature of general departmental policy. It is the appraisal and acquisition of these latter types of regional records (in conjunction with headquarters-based records) that will lead to a more complete archival record being acquired by the National Archives.

The *National Archives of Canada Act* (1987) requires that any record of most federal agencies, which is appraised as having historical and archival value, be transferred to the control of the National Archivist upon the expiry of its retention period, no matter where it is located in the country. Traditionally, the National Archives believed that regional records merely reflected the implementation of federal government activity in a specific geographical location. Because of the local nature of these records, they were thought not to be of national significance and therefore not worth preserving by the NA. The widely held belief was that regional information found in headquarters records would sufficiently document federal activities throughout the country. In the mid-1970s, however, government records archivists at the National Archives began to question this traditional view. Initial visits to regional offices and federal Records Centres indicated that certain federal government records created in the regions were of national significance, unique and therefore worth preserving.² It was noted as well that, with the increasing decentralization of federal operations, substantially more records were being created in the regions. These early studies also confirmed that policy formation and many significant operations were indeed being carried out in the regional offices of many federal government departments. The records found in these regional offices in turn reflected these functional changes in the circumstances surrounding records creation.³

The initial work carried out by government records archivists in the mid-1970s resulted in the National Archives creating its first policy on regional records. The new policy, approved in July 1975, stated that archivally significant material was being created in the regions, that these records should be appraised and brought under the control of the National Archives and that in the appraisal process, federal archivists should work closely with those at provincial institutions.⁴

The result of the 1975 policy was that government records archivists from the National Archives began to spend more time researching the regional component of federal agencies, in an attempt to develop a strategy for the appraisal of regional records. After 1983, these efforts were to be dramatically increased, as were initiatives to develop a rational and feasible regional government records policy, due to the proclamation of the Access to Information and Privacy legislation (ATIP) on 1 July 1983. The ATIP legislation states that the National Archives, like all federal agencies, is responsible for responding to any information or privacy requests for records under its "control." This includes all material identified as archival on records schedules, where the retention periods have expired and the material is being held in federal Records Centres across the country. As a direct result of the ATIP requirements, starting in March 1984 the Government Archives Division began sending government records

archivists to the various Records Centres, where they initiated accessioning procedures in order to bring these records under NA “control.” About the same time, GAD was conducting limited surveys of those regional records currently not scheduled and therefore falling outside the normal acquisition process. The results of these trips and surveys revealed much more starkly to GAD the existence of archivally valuable material held in Records Centres — and, more seriously, retained in government offices all across the country. It was obvious that new measures were needed in order to both fulfil the archival acquisition mandate of the National Archives and the requirements of the ATIP legislation.⁵

In 1986, on behalf of the Historical Resources Branch, GAD presented to the Senior Management Committee at the National Archives five options concerning regional records. These options will be briefly described, as they are the key to understanding the rationale behind the new regional initiatives of the NA.

The first option presented was to **do nothing**. This was rejected immediately. Not to deal with the situation would mean that the National Archives would not be fulfilling its mandate under the Public Records Order and the soon-to-be-passed *National Archives Act*, or its responsibilities under the ATIP legislation. Regional components of records schedules would continue to be limited, and historical records held in government offices across the country would be effectively abandoned.⁶

The second option was to **continue the present minimal control** begun in 1984. This was ultimately rejected as well. This course of action would have included annual visits of NA archivists to the four furthest Records Centres, to evaluate and appraise regional records schedules for transfer to the National Archives. Archivists would accession the archival portion under NA control, and then leave it in those centres (Vancouver, Edmonton, Winnipeg and Halifax) as ‘archival holdings’ under minimal control. (Archivally valuable records from regional centres in Ontario and Quebec, by contrast, are transferred to Ottawa). Minimal control meant that there would be no archivists on site to describe or service these records. This option was seen as acceptable in the short term, but annual short visits to various parts of the country would not enable Ottawa-based archivists to gain a fuller understanding or in-depth knowledge of the regional component of departmental operations. Continuing with such minimal control also meant that, even when regional records were included in a proposed schedule submitted by a department for approval, the archival limitations placed on such records would not be based on any regional archival knowledge. These schedules would be completed by headquarters-based records managers and headquarters-based archivists. This was viewed as unacceptable.⁷

Option three was to **delegate the functions to provincial, university or local archives**. In the past, various archives across the country have expressed interest in acquiring certain prestigious federal regional records, an example being the pre-1900 Dorchester, New Brunswick prison records. But none indicated a willingness to extend full records management and archival programmes either to all the records of every federal government department in their specific geographical area of control, or over all the records of any one department, or even over the records of one major regional operation of one department. This is understandable in an age of restraint, as each archives struggles to meet its own mandate. But even if there were such a willingness on behalf of a provincially-based archives, this solution would alienate these records

from federal control, and would thus possibly deny or impede a Canadian citizen's rights and the protection granted to them under the ATIP legislation. In addition, this option would ignore federal agency reluctance to lose control over their records and would break the continuity of the long-term administrative, operational and legal needs of the federal agencies.⁸

Option four was to **bring all regional records to Ottawa**. This option would include regular visits by NA archivists to the Records Centres to appraise and accession regional records and to arrange for all selected records to be shipped to Ottawa. The advantages of this option included the consolidation of all archival records in one locality, thereby resulting in little duplication of administrative practices. But the disadvantages far outweighed the supposed advantages. Scheduling would continue to be completed by Ottawa-based archivists and records managers. Therefore, a central Canadian bias would continue in the scheduling of regional records, resulting in the acquisition of a poorer quality archival record. Furthermore, archivists still would not develop the regional expertise that is imperative for the acquisition, appraisal, description and public service of regional records. It is also true that sending the records to Ottawa would distance them greatly from their main researchers in those regions close to where the records were created. In addition, many regional offices of government departments refuse to allow their records to be sent to Ottawa. They instead wish them to remain close to where they were created and where they are required for consultation. All of these disadvantages led to the rejection of option four.⁹

The fifth and final option was to **establish regional archives in the furthest Records Centres**. It was proposed that NA archivists be permanently employed in Vancouver, Edmonton, Winnipeg and Halifax, providing a full range of services to government departments and to the public. Ottawa-based archivists would continue their current responsibilities for records created in Ontario and Quebec regional offices.¹⁰ This final option would result in the development of a truly regional acquisition process, and in co-operation with Ottawa-based archivists the acquisition of a complete archival record for any given department. This option was suggested to the records managers of various regional offices, to Records Centre managers and to the directors of other divisions in both the Historical Resources and Government Records Branches at the National Archives; their responses were all positive. Accordingly, this became the most acceptable solution.¹¹

The approved final option led the Senior Management Committee at the National Archives to approve in 1987 the following regional records policy statement: "Regional government archival records produced in the regions and relating to the regions will, in general, remain in the regions under the control of the National Archives."¹² The NA was now committed to an approved regional records programme, leading to the acquisition of records of national significance that were being created all across Canada. No longer were regional records to be written off as largely duplicates or routine, and no longer were those identified for archival preservation to be wrenched from their geographical context and sent to Ottawa. Unfortunately, this policy was not coupled with any additional resources for implementation. As a result, GAD archivists continued their annual accessioning trips to regional Records Centres (option two) and attempted to increase their knowledge of government operations throughout the country. Because of the lack of new resources, in February 1988 another report was sent

to the Senior Management Committee, reviewed, and two further options were accepted.¹³

The first option was **enhanced GAD control**, which featured more frequent visits by GAD archivists to Records Centres for scheduling and accessioning regional records; revised appraisal procedures to assist both GAD and the Records Centres in better handling the extensive and growing amount of material housed by the latter; and the training of Records Centre staff by GAD. This option also included the transfer to GAD of unscheduled and older records still housed in the four furthest Records Centres, while ensuring that GAD archivists in Ottawa would also still be responsible for records created in central Canada and housed in Toronto, Montreal and Ottawa.¹⁴ GAD archivists responsible for those departments with a strong regional presence would pay particular attention to regional departmental issues through additional historical research; by regular contact with both headquarters and regional records management staff; and through emphasizing more particularly the regional dimension in appraisals connected with records schedules. By following this option, GAD archivists would gradually develop an expertise for their department's regional records, thereby gaining the knowledge and expertise needed to implement more fully the regional archives programme approved in 1987.¹⁵ It was felt that, in this age of restraint, such enhanced GAD control was probably the only way that the question of regional records could be accommodated, unless significant new resources and people were added to the division's complement.

A second option approved by Senior Management at the same time called for the establishment of a **Regional Archives Pilot Project** at the Vancouver Records Centre. Plans included hiring two contract archivists for at least one year to implement the National Archives first regional archives. These individuals would perform all of the necessary archival functions in Vancouver, rather than having GAD archivists attempting to do so from Ottawa. The short-term project would have as its priorities first, the selection, control and some limited reference services for the immense backlog of archival records already in the Records Centre; and second, the development of proper records scheduling for those departments with strong regional responsibilities. Other priorities, including full reference services, would proceed when better control of the records had been established.¹⁶

The pilot project was shifted to the Winnipeg Records Centre later in 1988, when a particularly valuable group of records concerning Canadian National Railways and its predecessors was found and needed immediate attention. These records, dating from 1895 to the 1970s document the immigration, settlement and transportation history of the Canadian West. The entire regional archives project was thus shifted from Vancouver to Winnipeg, but then stalled.¹⁷ Budget restraint, followed by budget cuts, effectively halted the Regional Archives Pilot Project. Option one is continuing, albeit at a curtailed level, due to the cutbacks, while GAD archivists are also continuing in their attempts to understand and capture regional information in their records schedule appraisals. In the past two years, GAD archivists have completed three schedules with a strong regional component.¹⁸

With major regional activity thus sidetracked, limited funds have instead been channelled into additional regional research. For the first time ever, an entire geographic area was chosen for study, rather than isolated departments or programmes,

in order to sharpen GAD's regional perspectives. The second part of this paper is a summary of a case study I completed in 1989 of all federal government records created in the Yukon. The purpose of the study was to add to the National Archives' knowledge of the nature of regional records by examining and analyzing all federal activities in one geographical area. The project was also designed to test the feasibility of intensive surveys of archival records at the regional level.¹⁹ The conclusions from the study have important implications for future NA regional initiatives.

The project began with research into the history of the federal government in the Yukon Territory from the time of the gold rush in 1898 to the present. This included the devolution of federal powers to the territory over many decades, which in turn had a direct impact on the creation of federal records. A list of all federal government departments having regional offices in the territory was compiled and further investigation into each of these departments was conducted. This resulted in the division of federal departments into four categories. Placement within these categories depended on the amount of independence given to a regional office in implementing national policy and in controlling budget allotment, as well as the level of input provided by that office in the creation of a regional or national policy. The nature of the work done by an office and the size of its operation were also taken into consideration.²⁰

Interviews were conducted with both regional department heads in Whitehorse and with their records managers. The questions asked centred primarily on records management concerns, including file classification systems, scheduling activity, transfer of records to regional records centres or headquarters, relationships with district offices and media type of the material created. Special attention was also given to uncovering the existence, if any, of older record caches. Other questions posed solely to the department heads concerned the nature, purpose and key functions of the department, the regional office's relationship with headquarters and the degree of independence allowed the district office in the formation and implementation of national policy. An investigation of the records followed the interviews. In the two departments placed in the first category, namely the Department of Indian Affairs and Northern Development (DIAND) and Health and Welfare, more time was spent examining the type, nature and uniqueness of their records. Investigation also included the types of material received from headquarters and whether the records indicated a regional bias in national policy. Finally, information was sought on whether there were disagreements with Ottawa over a national policy and its implementation in the Yukon, and how these disagreements were resolved.²¹

What became evident, both through the interview and reviewing process, was that those departments whose role was integral to daily life in the Yukon created the majority of the unique records of archival value. The Indian and Inuit Affairs Program (IIAP) and the Northern Affairs Program (NAP) of DIAND, for example, have in their custody unique records of the economic, social and political life of the Yukon. It became evident that without preserving these records of work in the territory, no complete history of IIAP and NAP could be written, and therefore a complete record for compiling the history of the Yukon would also be lacking. What is of importance here is the number and nature of the records originating in the Yukon. The two programmes cited above exercise considerable independence in dealing with the Yukon Territorial Government (YTG) and the Council of Yukon Indians. Their records are not all sent to

Ottawa; indeed, only copies of final reports make the trip across the country. The work of these programmes and the relationship between DIAND, the Territorial Government and the Council of Yukon Indians on the issues confronting the Canadian North are covered in detail only by the records generated in Whitehorse.²²

The independence of IIAP's operations in the North is further illustrated by the manner in which national policy is sometimes changed to comply with local situations. An example of this concerned the acquisition of new lands by IIAP for various Indian bands. In 1989, at the time these records were being examined, there was as yet no land claim signed with the Yukon Indians and therefore the purchase of new land for band use had to follow a specific national policy. The interplay between the national policy and regional requirements was clearly evident during the examination of the pertinent records. In 1988 the Han Indian band attempted to purchase additional land for housing; the band did not have a legal reserve, as DIAND had pressured them to move into Dawson City in the 1950s. When additional land became available within Dawson City, the Indians attempted to purchase this land. The Yukon region headquarters approved, but Ottawa would not agree because the purchase contravened existing national regulations. The Yukon region headquarters went ahead nevertheless and allowed the purchase while negotiations were still continuing with Ottawa. Many of the negotiations were carried on over the telephone and written reports detailing this event were not sent to Ottawa. IIAP in the Yukon thus had enough independence from Ottawa to override a national policy, and the only records documenting this event — and others like it — are to be found in the Yukon IIAP's files. In addition, this event resulted in a changed national policy regarding the purchase of land for Indian bands all across the country.²³

Similar conclusions were drawn from examining the records of the Medical Services Branch of the Department of Health and Welfare. The records in question cover the long and arduous history of the devolution of this branch to the Yukon government. They also are particularly important in documenting the social history of both the native and non-native populations of the Yukon. A block of records entitled Indian and Northern Services, in the central registry system, were found to detail the close relationship between the federal department and the native communities. Subjects covered include studies and reports on various health concerns such as suicide, alcoholism, AIDS, mental health, teenage pregnancies and family-related violence. There are also individual reports from each of the health centres throughout the Yukon. Included in these records is not just a litany of problems faced by the native communities, but also their attempts to come to grips with these problems. Success stories and examples of innovative constructive programmes can also be found among the records. Conclusions drawn from these reports are sent to Ottawa on an annual basis, but these forwarded reports contain only general comments. The nature and depth of the actual working programmes can only be derived from the records created in the Yukon.²⁴

The archival examination of the records of these two important departments indicates that the records at their Ottawa headquarters are, on their own, unable to document regional activity in a complete and accurate fashion. The Yukon records reveal a high degree of independence in the implementation of policy initiatives, and an ability to adapt a national policy to unique regional circumstances, or even to change that national policy.

The records of the departments placed in categories two and three — those departments whose functions did not have such a direct impact on life in the Yukon, or whose budget was a fraction of the two larger departments — must also be examined by the National Archives in order to isolate those records that indicate the unique role they play in the territory. Examples include the Canadian Wildlife Service of Environment Canada and the records of Labour Canada. The work these departments or agencies direct in the Yukon is indeed carrying out a specific national policy, but that implementation is often unique and thus must be documented. For example, the work done with the Caribou Porcupine herd by the Canadian Wildlife Service has an impact on the ecological, social and economic life of the territory.²⁵ This is also true of Labour Canada, where solutions found to specific occupational problems in the Yukon are unique to the territory and are only recorded in the Whitehorse office.²⁶ To acquire merely the headquarters' side of the picture would therefore result in only a partial history of the activities of such departments. The report on the Yukon regional records demonstrated on a wider scale than before the value of certain types of regional records and the necessity of a programme to deal with them.

As a result of all these developments, experiences, and studies, a review was conducted in 1991 of all National Archives' regional activities and a briefing note was presented to Senior Management Committee. The result was a decision to resurrect the Regional Archives Pilot Project in Vancouver by hiring two full-time archivists, beginning in 1992. The CN records project in Winnipeg will be revived by using contract archivists.²⁷ Despite severe resource restraints, therefore, the National Archives is thus continuing in its efforts to expand its regional archives programme.

The National Archives has expended considerable effort dealing with the massive amount of regional federal records created across the country. It has moved from the passive view of believing that enough regional information can be found in headquarters records to a more active attempt to determine the nature, scope and archival value of these records. As a result of this work, the National Archives has determined that all archival regional records must be stored, brought under control and serviced as closely as possible to the area where they were created. Regional records differ in nature and scope from their headquarters counterparts. To appraise and schedule only the headquarters records will result in an incomplete archival record of a department's mandate, functions and policy implementation. The National Archives must continue to sharpen its appraisal process and therefore to develop in its archivists, situated either in Ottawa or in the regions, a local expertise for each of those departments with a strong regional mandate. By so doing, the coming years will see the results of such understanding evidenced in an enhanced archival heritage that reflects the entire nation from north to south and coast to coast.

Notes

* This article is a reworking of my paper of the same title which was delivered at the Annual Conference of the Association of Canadian Archivists, Banff, Alberta, on 31 May 1991. The published version has benefited from the advice and editorial assistance of Terry Cook. As Regional Records Coordinator, Government Archives Division, Dr. Cook was also instrumental in enabling me to undertake the regional survey done in Whitehorse in November and December 1989.

1 This paper covers the period from the mid-1970s to the present. Current terminology is used for the following: the National Archives of Canada (NA) and the Government Archives Division (GAD).

2 There are at present Record Centres in Vancouver, Edmonton, Winnipeg, Toronto, Ottawa, Montreal, Quebec City and Halifax.

- 3 National Archives of Canada, Central Registry (hereafter CR), file 9431-1, vol. 1, Acquisition Evaluation - GAD - Departmental Field Offices - General, 1974-1986, "Committee on Acquisition and Access Policy: Report - Acquisition and Control of Field Office and Regional Office Material," Aug. 1976, pp. 2-3.
- 4 Ibid., Memorandum from Jay Atherton to H.A. Taylor, 17 Oct. 1975, p. 1.
- 5 Ibid., Ted van Leyen, Sam Kula, Harold Naugbler, Eldon Frost, "Report on Regional Archival Records," 8 June 1983, pp. 9-10.
- 6 Ibid., Terry Cook, "Archival Records in the Regions: Towards a PAC Policy - Discussion Paper for the Senior Management Committee," July 1986, pp. 5-6.
- 7 Ibid.
- 8 Ibid.
- 9 Ibid.
- 10 The Quebec Records Centre was created in 1990. Ottawa-based archivists will be responsible for the appraisal of these records, as well as those in the Toronto and Montreal centres.
- 11 Ibid.
- 12 NA, CR, file 9135-1, vol. 1. Terry Cook, "Archival Records in the Regions: Options for Immediate Action - Report for Senior Management Committee, 28 Feb. 1988, p.2.
- 13 Interview between Terry Cook and Paulette Dozois, 11 Sept. 1991.
- 14 NA, CR, file 9135-1, Terry Cook, "Archival Records in the Regions," pp. 2-5.
- 15 Ibid.
- 16 Ibid., Terry Cook, "Regionalization of the National Archives of Canada: A Pilot Project for the Vancouver Federal Records Centre - Implementation Plan." This was Cook's second report to the Senior Management Committee, following that mentioned fn. 6. At the request of Senior Management in response to this second report, Cook's third report was drafted (see fn. 14) outlining two short-term objectives, 19 Sept. 1987, pp. 2-3.
- 17 Ibid., Memorandum from Terry Cook to Eldon Frost, "Regional Records Update," 8 Dec. 1989, pp. 2-3.
- 18 Interview between Terry Cook and Paulette Dozois, 11 Sept. 1991.
- 19 NA, CR, file 9135-1, vol. 1, Eldon Frost to Paulette Dozois, 2 Aug. 1989, pp. 1-3.
- 20 Ibid., vol. 2, Paulette Dozois, "Yukon Regional Records Survey Report," Apr. 1990, pp. 1-5.
- 21 Ibid.
- 22 Ibid., pp. 6-15.
- 23 Interview between Paulette Dozois and Dr. Dan Daniels, Regional Director of IAP in Whitehorse, 10 Nov. 1989.
- 24 Dozois, "Yukon Regional Records Survey Report," pp. 34-37.
- 25 Interview between Paulette Dozois and Dan Russell, Chief Biologist with the Canadian Wildlife Service of Environment Canada in Whitehorse, 15 Nov. 1989.
- 26 Interview between Paulette Dozois and Frank Bachmier, Labour Canada's Officer for the Yukon and the Northwest Territories in Whitehorse, 24 Nov. 1989.
- 27 Jean-Pierre Wallot, "Building a Living Memory for the History of Our Present: New Perspectives on Archival Appraisal," unpublished paper delivered to the Canadian Historical Association, Kingston, Ont., 5 June 1991, p. 29.