

One Size Fits All? The Portability of Macro-Appraisal by a Comparative Analysis of Canada, South Africa, and New Zealand

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RÉSUMÉ Cet article analyse la méthodologie de la macro-évaluation ailleurs que dans le contexte canadien où cette approche a été développée et examine la pertinence du modèle pour les archives gouvernementales au Canada, en Afrique du Sud et en Nouvelle-Zélande. L'auteur étudie la macro-évaluation d'abord en tant que cadre théorique, puis comme une réponse aux difficultés d'ordre pratique qui découlent des autres approches d'évaluation archivistique. Il se penche ensuite sur les questions de gestion du changement entourant l'adoption de la macro-évaluation dans d'autres juridictions. L'article conclut que tant la théorie que la pratique doivent être prises en compte lorsqu'on envisage l'adoption de nouveaux modèles et que, bien que les conditions locales doivent être considérées, la valeur possible des innovations provenant de l'étranger ne doit pas être ignorée.

ABSTRACT This article examines the methodology of macro-appraisal in environments other than the Canadian context in which it was originally developed. It considers the suitability of the model for government archives in Canada, South Africa, and New Zealand. Macro-appraisal is discussed first as a theoretical framework and then as a response to practical difficulties arising from other approaches to appraisal. The change management issues surrounding the possible adoption of macro-appraisal in other jurisdictions are explored. The article suggests that both theory and practice need to be addressed when considering the adoption of new models. While local conditions need to be considered, the possible value of overseas innovations should not be ignored.

Introduction

Appraisal has, in recent years, been one of the most debated subjects in archival theory and practice. Macro-appraisal thinking represents a major Canadian contribution to this debate, as archivists and archival institutions grapple with increasing quantities and complexities of the records universe.

The purpose of this paper is to explore the portability of macro-appraisal: to what extent does it offer a universal solution to issues of appraisal? Macro-appraisal has its roots in specific record-keeping problems of theory and practice: to what extent is its effectiveness or suitability bounded by situational factors? Under what circumstances is macro-appraisal a suitable way of

expressing the need for some form of selection? In particular, this issue will be explored through consideration of government archives in Canada, South Africa, and New Zealand, all jurisdictions in which macro-appraisal has been implemented or considered.¹

I would like to make two caveats. Being from New Zealand, I do not intend to critique the theory or implementation of macro-appraisal in Canada or South Africa. The aim is rather to understand the necessary pre-conditions for successful use of macro-appraisal. Second, in considering macro-appraisal in Canada and South Africa I have been heavily dependent on published discussion and analysis. This will inevitably represent only a part of the full picture, and the complex nature of the dynamics affecting the suitability of a particular model should not be underestimated.

Debate on appraisal theory and practice is hampered by a lack of widespread shared understandings of key terms within the archival community – and between archival communities. This article uses the term macro-appraisal to refer to the formal appraisal model used by the National Archives of Canada,² and directly inspired, closely related approaches such as that of the National Archives of South Africa. Similar but distinct appraisal frameworks, such as the Dutch PIVOT model, or Australian functional appraisal as articulated in the DIRKS methodology, are considered separate from the macro-appraisal tradition for the purposes of this essay.

Record-keeping professionals have, in recent years, become more aware of the contingent nature of strategic responses, and of the cultural and contextual limitations of particular methodologies, particularly concerning electronic records. Our literature deals repeatedly with the importance of recognizing organizational culture in choosing strategies to deal with record-keeping issues. David Bearman has claimed that “the corporate culture of the organization ... will probably be the most important variable in selecting the tactics to use in management of electronic records.”³ The environment or context – or time and place – I suggest, is equally important in the selection of appraisal methodology.⁴

1 This article is based on work carried out for study towards a Master of Information Management and Systems at Monash University, Australia, and formed the basis of a paper to the 2001 ACA Conference in Winnipeg. The views in this paper are my own and do not necessarily represent the position of Archives New Zealand. I would like to thank Terry Cook and Verne Harris for their helpful comments during the development of the paper.

2 Most recently articulated in National Archives of Canada: Government Records Branch, *Appraisal Methodology: Macro-Appraisal and Functional Analysis* (Ottawa, 2001).

3 David Bearman, *Electronic Evidence: Strategies for Managing Records in Contemporary Organizations* (Pittsburgh, 1994), p. 187.

4 See Terry Cook, “Overview of Appraisal: Why are we here this week?” paper to Monash University Appraisal Seminar, March 1999, p. 16: “There is no universal standard or rigid theory; solutions – and indeed animating concepts – will rightly reflect their time and place.”

Background

Before looking in detail at the issues which arise in the development, implementation, and ongoing use of macro-appraisal, it is worthwhile to consider the three environments which will provide the points of reference for this analysis of macro-appraisal.

Canada

Pressure on appraisal practice in Canada mounted through the 1980s with the passing of access to information and privacy legislation in 1983 (ATIP), of the *National Archives of Canada Act* in 1987, and with changes in technological and administrative dimensions of the government record-keeping environment. Response to these pressures, drawing on a range of sources, emerged in the macro-appraisal approach proposed by Terry Cook in the 1991 RAMP study, *The Archival Appraisal of Records Containing Personal Information*, and introduced by the National Archives of Canada in 1991 to reform the appraisal programme for government records. Macro-appraisal has been described as a planned, research-based, top-down, functions-centred approach that focuses especially on the citizen's interaction with the state. Its main elements are: the Government-Wide Plan for the Disposition of Records, which prioritizes agencies; criteria for assessing functions and programmes within agencies; Multi-Year Disposition Plans negotiated with target agencies; and the methodology for appraisal within the context of each planned submission.⁵

South Africa

The practice of appraisal in South Africa emerged as a key discussion point during the democratization of the Republic. A visit by Eric Ketelaar in 1992 first raised macro-appraisal as an issue for South African archivists.⁶ Then, in November 1994, Terry Cook visited South Africa and spoke to audiences across the country on appraisal issues, especially the macro-appraisal model then being implemented in Canada.

The challenges issued by Cook heightened existing dissatisfaction with appraisal theory and practice, and led to the establishment of an appraisal review committee to assess existing appraisal policy, to assess macro-appraisal in the same terms, and to make recommendations, including “the

5 See Bruce Wilson, “Systematic Appraisal of the Records of the Government of Canada at the National Archives of Canada,” *Archivaria* 38 (Fall 1994), pp. 218–31.

6 Verne Harris, “Redefining Archives in South Africa: Public Archives and Society in Transition, 1990–1996,” *Archivaria* 42 (Fall 1996), note 91.

desirability of adopting macro-appraisal partially or in toto and if desirable, how change should be effected and what it would require.”⁷

As part of the committee’s research, its chair, Verne Harris, visited Canada to investigate the macro-appraisal programme at the National Archives of Canada. The findings of the committee were presented in March 1996, and included the key recommendation that macro-appraisal be adopted as the foundation of State Archives appraisal policy.⁸

New Zealand

Appraisal practice in New Zealand in the past ten years has been marked by the introduction in 1991 of a charged, contestable model for public records appraisal, in line with widespread public sector reforms based on contractualism.⁹ Under this approach, Archives New Zealand charges agencies for appraisal work, competing with private sector consultants to conduct the analysis. Dissatisfaction with current appraisal practice has emerged in New Zealand over recent years, and this resulted in a formal review of the appraisal regime in 1998-99.¹⁰ This review did not focus specifically on appraisal methodology, but there was interest in macro-appraisal expressed during the consultation phase of the review, and recommendations in the final report included further investigation of how macro-appraisal might work in practice in a New Zealand public sector environment.

Development of Macro-Appraisal

To understand whether macro-appraisal could effectively be transported to a different environment, the first area to examine is the background to the methodology. Macro-appraisal was not created in a vacuum. Why was the development of macro-appraisal necessary? In response to what issues did it come about? How may the Canadian environment have shaped it?

If macro-appraisal were a response to peculiarly Canadian difficulties or circumstances, scepticism as to its value in other environments may be justi-

7 Appraisal Review Committee (ARC), State Archives Service of South Africa (SASA), *Report on Current State Archives Service Appraisal Policy and the Theory and Practice of Macro-Appraisal* (March 1996), Section 1.1 Establishment and Mandate.

8 State Archives Service of South Africa, M10/1/1/1, Appointment of Appraisal Task Team, memorandum of 24 April 1996.

9 For a discussion of the impact of these reforms on New Zealand public sector record-keeping, see Michael Hoyle, “Review, Restructure, and Reform: Recordkeeping Standards in the New Zealand State Sector,” *Archivaria* 48 (Fall 1999) pp. 44–63.

10 National Archives of New Zealand, *Appraisal Review: Discussion Paper*, November 1998. Available at: <http://www.archives.govt.nz/statutory_regulatory/reviews/appraisal_service/discussion_paper_frame.html> (accessed 24 December 2001).

fied. If, however, macro-appraisal is designed to deal with widespread appraisal problems, it may be appropriate to employ it wherever those circumstances are found.

Two distinct pressures are evident in the development. First is the desire to have a stronger theoretical basis to appraisal practice. It is difficult if not impossible to have defensible and robust practice without a clear theoretical underpinning.¹¹ Second, a more immediate need for change was found in the practical problems facing the National Archives of Canada's appraisal programme. Difficulties in providing timely response to agencies; concern about lack of prioritization; consistency of appraisal decisions; and other such indicators motivated a refinement of practice. Particular practical issues arose from the increasing importance of electronic records – appraisal practice needed more than ever to cover record-keeping across all media in agencies in an integrated manner. These problems had been aggravated by legislative change. The 1987 *National Archives of Canada Act* doubled the number of agencies subject to its provisions compared to the old *Public Archives Act* of 1912. All of these agencies were prohibited by law from destroying any record without the National Archivist's authorization, and by implication, prior to appraisal. With very few new resources, and expectations raised by the law among all the old clients and, of course, concern among all the new ones, some different way of conducting appraisal, and of managing records disposal, was necessary.

The top-down approach can be seen equally as a reaction against the (practical) inefficiencies of fragmentation, and risks of duplication; or as a logical consequence of the (theoretical) decision to seek out the most concise interactions of citizen and state.

Theory

Macro-appraisal is based on an articulation of appraisal theory (the value of records) as distinct from archival theory (the nature of records). Cook suggests there are three main schools of appraisal theory, representing three sources of value: "the creator, the user, or society at large."¹² Macro-appraisal in this analysis is an assertion of society as the origin of value in records.

Adoption of a theoretical position such as this is a matter of faith – a "first principles" assumption as to the role of an archives. On one level, such axiomatic choices are independent of the particular context within which they may

11 Terry Cook "Why are we here?" p. 5: "one has to know first what one means by 'valuable,' one has to know what one is looking for, BEFORE developing the means to find it. Theory comes first."

12 Terry Eastwood suggests a different three-way division of the grounds for evaluation: provenance, pertinence, and use. "How Goes It with Appraisal?" *Archivaria* 36 (Fall 1993), p. 116–17.

be implemented. On another level, though, the acceptability of a particular theoretical position is influenced by the particular context within which it is judged; theories cannot be evaluated in isolation from a real world situation.¹³

Further, while no appraisal theory can be proven to be “true,” there are legitimate means of evaluating and comparing competing theories of value. Theoretical models must be internally coherent and comprehensive; they must also be consistent with observation of how the real world works, and provide useful answers to problems of practice. Macro-appraisal theory draws inspiration from such diverse sources as the ideas of postmodernists such as Foucault, thinking in sociology and the work of Anthony Giddens, and the impact of feminism on historical and scientific research. It asserts that theories based on utilitarianism (seeing value as use or anticipated use by researchers) have flaws of logic and applicability, and that theories of value based on statism (with enduring value designated by the records’ creator) are equally problematic.

Canadian public archives practice has over the years been notable for the “total archives” concept, which sees the National Archives of Canada with responsibilities for both public and private archives.¹⁴ The institution has a formal role in respect of the whole of Canadian society, and may thus be naturally inclined towards the societal model as the theory of choice.

The importance placed on the theoretical underpinnings, and the willingness to vigorously criticize the dominant use-based appraisal models is perhaps reflective of Canadian archivists’ strong involvement in the recent development of archival theory.¹⁵ This background may have contributed to a response to issues in appraisal practice which is driven by a clearly articulated theory of appraisal.

Macro-Appraisal and Record-Keeping

Consideration of any appraisal model gives rise to questions of its relationship to key record-keeping processes, such as decisions as to which records to create and capture, and what links to make between the individual records in record-keeping systems. These decisions, along with the decisions flowing from macro-appraisal analysis, shape the record available at any point in time, and the meaning that can be drawn from it.

13 At a minimum, individual archivists will choose which assumptions to make, and which theory to accept on the basis of their personal, real world experiences.

14 *National Archives of Canada Act*, s. 4(1) “The objects and functions of the National Archives of Canada are to conserve private and public records of national significance and facilitate access thereto...”

15 Terry Cook, “Final Commentary Session of the Appraisal Seminar,” paper to Monash University Appraisal Seminar (March 1999), p. 1.

Macro-appraisal identifies a process for determining the value society ascribes to certain records or functions. In practice, it sets out a methodology to allow archivists to locate those records most valued by society. This process is distinct from, but complements, agency records management programmes, whose decisions are primarily based on identification of their business needs. This distinction has led to suggestions that macro-appraisal is based solely on cultural heritage purposes. Such suggestions are an overly narrow reading of macro-appraisal.

At a theoretical level, the key choice in macro-appraisal to use society as a source of value makes no assumption as to how the values identified will be applied. The complete record-keeping regime reflects agency needs, government's expectations of its agencies, and societal expectations. Macro-appraisal sees archivists acting as society's agents in the process. Macro-appraisal analysis could inform decisions on records creation and management as well as on retention and disposition decisions.

Similarly, the identification of society as the source of value should not glibly be equated with a cultural heritage purpose for archives. The separation of cultural memory, business, and accountability purposes can only be taken so far. Social memory and community expectations embrace much of the concept of accountability as it is used in record-keeping literature. Similarly, the need to be seen as good corporate citizens is an increasingly important business driver for both commercial and public sector organizations. Macro-appraisal as a theoretical model can thus be applied in regimes which take varying positions on the role of the archives in respect of current record-keeping, although the way in which its evaluative framework is applied may be quite different.

South African Transformation Discourse

For South African archivists, the appeal of the macro-appraisal approach was its theoretical assumption of value attribution by society and its practical applicability to the South African situation. In the case of South Africa, the democratic imperatives of the change within society were defining factors in requiring a changed appraisal policy. A theoretical model based on the needs of users, which in practice were perceived as the needs of Afrikaner historians and the old establishment, was unacceptable in the new South Africa.

Archival debate in South Africa recently has been dominated by a "transformation discourse ... informed by the assumption that archives require redefinition, more precisely re-invention, for a democratic South Africa."¹⁶ Among

16 Verne Harris, "Transforming South African Archives: Discourse and Delivery," *SA Archives Journal* 38 (1996), p. 2. Harris discusses the transformation discourse in detail in "Redefining Archives in South Africa."

the ideas which have been identified as shaping this discourse, four points are of particular relevance to the development of appraisal practice:

- A public archives is not essentially a heritage institution ... it cannot be understood properly without taking into account its role in information management and public administration.
- Archives should be conceptualised around processes rather than records in physical custody.
- ... Archivists are active shapers of social memory and documenters of society....
- Archives should be driven by the post-apartheid imperative to give the voiceless voice.¹⁷

South African efforts to redefine their appraisal policy must be seen in the context of this transformation discourse. The roots of changed appraisal thinking and practice in the Republic are found in its dramatic social and political transformations, rather than the theoretical debate of the archival profession or the programme needs of the institution. Several possible approaches could have been taken in response to the need for an appraisal model that reflected the new South Africa, but macro-appraisal, with its clear recognition of the power dynamics inherent in records, was seen as providing the most appropriate framework at a theoretical level for the evaluation of South Africa's public records.¹⁸

Theory in New Zealand

Archival theory is not strong in New Zealand, perhaps in part due to the lack of local post-graduate qualifications.¹⁹ Archives New Zealand practice has been influenced by the prevailing theoretical models of public management. In recent years, New Zealand public management discourse has been dominated by the Treasury, with economic theory providing the principal analytical framework. The efficiency of the market was the underpinning assumption, and the market model has strongly influenced current New Zealand appraisal practice.

The implementation of a market-driven appraisal regime has also defined the terms of theoretical debate in New Zealand. Issues of the proper relationship between Archives New Zealand, agencies, and government have been at the heart of professional discussion, rather than Cook's defining appraisal

17 Harris, "Transforming South African Archives," p. 2.

18 See Verne Harris, *Exploring Archives: An Introduction to Archival Ideas and Practices in South Africa* (Pretoria, 2000), pp. 40–45.

19 See Hoyle, "Review, Restructure, and Reform," p. 46, who notes "New Zealand does not have its own strong theoretical traditions in the records and archives fields; it has borrowed overseas methodologies and adapted these to the local environment."

question of the source of archival value. In the absence of strong, local theoretical models, New Zealand practice has been shaped by overseas thinking, most notably by Australian continuum-based work. Many in the New Zealand record-keeping community remain wary of the applicability of imported models, however – an attitude which must be borne in mind when considering the possible adoption of macro-appraisal there.²⁰

Practical Reasons

While professional archivists may wish for a sound theoretical basis to their practice, concern about the detail of the theory rarely provides a compelling reason for change if the practical implementation is, for all intents and purposes, functioning adequately. However, the development of macro-appraisal was as much a matter of dealing with a real need to refine business practice as a concern about the theoretical validity of that practice.

Similar issues, including reactive, fragmented, ad hoc, and inefficient appraisal of low value records, were faced in each of the jurisdictions under discussion here. Indeed, it is striking how similar the pre-1991 Canadian situation sounds to the New Zealand environment described in the National Archives of New Zealand's *Appraisal Review: Discussion Paper*.²¹

(1) Focus on disposal of records: The concentration on appraisal as authorisation for disposal leaves it as an “ambulance at the bottom of the cliff” intervention, rather than using the analysis to improve the management of records through a range of processes.

(2) Fragmentation: The multitude of small appraisal contracts currently carried out creates difficulties in ensuring consistency and coordination, and leads to a high overhead cost in managing the work.

(3) Reactive: Appraisal is carried out where requested by agencies rather than in line with strategic priorities.²²

Even though the unique political situation in South Africa created pressure for a theoretical approach similar to that advocated in macro-appraisal, many of the same practical problems were present. The 1995 annual report of the

20 Brad Patterson, “New Dawn for the National Archives,” *Archifacts* (April 2000), p. ix: “there must be recognition within National Archives that New Zealand situations frequently demand New Zealand solutions.”

21 It is also likely, however, that awareness of literature describing Canadian experiences influenced the way in which the New Zealand paper analysed the local situation.

22 National Archives of New Zealand, *Appraisal Review: Discussion Paper* (November 1998), Executive Summary.

(then) South African State Archives and Heraldic Services discusses appraisal at some length, presenting the case for change:

In South Africa, where offices of the state lacked legitimacy among the broader community in the past, it is perhaps inevitable that the process of appraisal by public archivists was perceived by some to have been informed by the ideology of apartheid.

The State Archives Service strives to achieve planned and systematic records disposal... However, appraisal still tends to take place in a fragmented manner, with separate parts of governmental offices taking the initiative to apply for disposal authority when pressed for storage space. In this situation, the attention is focused too often on individual records with no archival value, and the fragmented approach to appraisal results in a degree of duplication in archives depots.²³

While the former quote reflects uniquely South African problems, the latter could be written as a description of problems with appraisal practice in New Zealand, 1999 (or indeed, Canada, 1989).

While the symptoms in all three regimes may thus appear similar, it is important to ask whether they have common causes, or are only coincidentally alike. As noted above, macro-appraisal theory challenged the dominant theoretical basis of appraisal. In Canadian appraisal discourse, the recognized problems of practice were frequently attributed to the existing theoretical position of user-attributed value. In South Africa, the Appraisal Review Committee charged with considering the state of practice in the Republic came to a similar conclusion, identifying major problems as a result of the South African Archives Service's use of Schellenbergian, use-driven appraisal.²⁴ A number of difficulties were noted in the application of expected use as the basis for appraisal. Research trends are constantly changing and difficult, if not impossible, to predict. Further, archivists can never be in a position to appreciate the research value to all disciplines, and similarly, if all possible research uses are considered, almost every record has value. Three major deficiencies were noted in the results of this policy:

Firstly, ... documentation of the experience of the under classes was poor... Secondly, ... too much [was] being preserved.... [T]he service faced recurring space crises, [and] the level of control it exercised over the holdings and its ability to make them available effectively were seriously eroded.... The third key area of concern related to electronic records.... [T]he Service's reactive approach to appraisal, and the inadequacy of its

23 Annual reports of the Directorate State Archives and Heraldic Services, Department of Arts, Culture, Science and Technology, South Africa, 1995 (Pretoria, 1996), pp. 9–10.

24 Appraisal Review Committee (ARC), State Archives Service of South Africa (SASA), "Report on Current Appraisal Policy," 2.3.2, p. 7.

contextual analyses, condemned [it] to touching only the tip of the electronic records iceberg.²⁵

Common problems thus existed in all three archival jurisdictions, and, in each case, the appraisal philosophy was largely blamed for this.

Commercialized Appraisal

Unique New Zealand concerns about appraisal practice focus around the “user pays” nature of appraisal in the New Zealand public sector. It has been argued that the charging regime for appraisal aggravates problems with appraisal, by focussing attention on the agency-specific benefits at the expense of whole-of-government or societal benefits.²⁶

Appraisal reports are prepared by either the Archives’ Business or consultants on a commercial basis, or by agencies in-house, but, significantly, a separate unit within Archives New Zealand assesses them in line with the Archives’ *Appraisal Standard* and advises the Chief Archivist on whether they should be approved.

When charging for appraisal was introduced in 1991, a perceived need to generate revenue was the immediate reason, however, a range of advantages were identified:

- the introduction of such charges was in keeping with government policy to make transactions between departments transparent;
- the regime clarified that preparation of recommendations for records disposal (as distinct from their authorization) is contestable – although this distinction was later to prove somewhat cloudy;
- it was anticipated that more appraisal would be done, presumably as a result of the clarification that outside contractors, records management consultants, or providers of the actual appraisal other than National Archives could prepare recommendations;
- a final perceived advantage was that charging would raise the profile of the appraisal function. Appraisal had previously been given a financial profile when savings by reduction in space were reported in dollars; the value of appraisal would be more evident if it realized revenue.

25 National Archives of South Africa, *Appraisal Policy Guidelines* (December 1998), Introduction.

26 John Roberts, “Market Forces: Electronic Records Appraisal in the Age of Economic Rationalism,” Paper to the Australian Society of Archivists Conference, Fremantle 1998. Available at: <http://www.archives.govt.nz/archivesnz/staff/papers/market_forces_frame.html> (accessed 24 December 2001).

In part, then, charging for appraisal was intended to address problems also tackled by macro-appraisal – appraisal coverage and agency engagement. In practice, particular problems have emerged under this approach, which pose barriers to adoption of new approaches, such as macro-appraisal's whole-of-government model or multi-agency general disposal schedules.

Implementation

Identification of problems to be addressed and of the theoretical basis to a revised methodology is only part of the story. Limitations on the methods of effecting a change may mean the optimal solution in one context is entirely impractical in a different environment. Indeed, even where similar problems exist, different responses may be required because of the difficulties of implementing particular changes in the different political, organizational, financial, or legislative contexts. The South African Appraisal Review Committee identified a number of prerequisites to achieve the goal of full implementation of macro-appraisal:

- A significant degree of legislative and administrative muscle in the area of records management ...
- Adequate human and other resources ...
- The will to make it work. The commitment of both management and appraisers is essential.
- A high degree of cooperation and competence in records management by client offices.²⁷

Consideration of the Canadian, New Zealand, and South African experiences suggests the following critical success factors for implementation:

- adequate resourcing;
- agency support and competence; and
- political support.

Resourcing

Resourcing issues are a consideration with any proposed approach to appraisal, but special attention should be paid to the resource requirements of the initial implementation. Lack of the availability of resources to effect change is frequently a barrier in smaller scale operations.

The introduction of macro-appraisal may be difficult for smaller institutions to achieve, where there is less capacity to absorb such projects and develop the

²⁷ Appraisal Review Committee (ARC), State Archives Service of South Africa (SASA), "Report on Current Appraisal Policy," 3.3.3.2.

necessary whole-of-government analysis. Archives New Zealand, for example, has an appraisal staff of three archivists and one manager. Within such a small resource pool, even the initial commitment to develop a functional analysis of government may prove an insurmountable hurdle. The government-wide functional analysis is not a stage which can be omitted without fundamentally changing the nature of the approach. Neither is it something which can be borrowed from other jurisdictions, as such whole-of-government functional analysis is not itself portable, but unique to a particular time and place.²⁸

There is potential for minimizing this barrier through an incremental approach. In Canada, despite a rapid setting of overall research categories and strategic prioritizing by the Government-Wide Plan, the actual work was incremental, out of political necessity to show results to records-creating agencies, rather than just doing research for years. Resource implications are further managed by the cyclical nature of the planned approach, with multi-year dispositions plans (MYPDs) scheduling the appraisal of different functional areas of a single target institution over a number of years.

The difficulty of establishing the necessary whole-of-government framework is made more acute in New Zealand by the existence of demanding revenue targets for the appraisal group. Any time spent on such development work would not only be at the expense of other activity, but also at the expense of revenue. This would create a need for corresponding savings in other programmes which, in a smaller overall budget, can be harder to identify. On a more positive note, the Labour-Alliance coalition government elected in late 1999 has increased the budget of Archives New Zealand, better positioning the institution to absorb such costs.

In considering the size of this barrier to implementation, one should also remember that there are effective economies of scale generated in a larger public sector. Both the New Zealand and Canadian public sectors will carry out many of the same functions: each will have agencies carrying out responsibilities for justice, health, immigration, and so on.

The same is not true, however, of the benefits of taking a functional approach. A function carried out for a larger population will generate more records. The gain to be had from considering functions rather than records, the benefits of a change from a “bottom-up” to top-down appraisal, will thus be more marked in a larger public sector, with a larger ratio of records to functions. The incentive for macro-appraisal is thus stronger in a larger jurisdiction, while the initial investment in developing the analytical framework remains relatively constant.

The human resources must be adequate not only in numbers, but in skill: “appraisers [must] cease being researchers’ ‘handmaidens’ and become scholars in their own right. They must combine intellectual vigour with scholarly

28 Chris Hurley, “Ambient Functions – Abandoned Children to Zoos,” *Archivaria* 40 (Fall 1995), p. 38.

vision, a thorough grasp of information systems, and expertise in functional-structural analysis.”²⁹ Macro-appraisal archivists require expertise unlike that needed for traditional appraisal. Indeed, the skill set required is elusive, suggesting there will be difficulties in environments lacking strong educational infrastructure to develop appraisal archivists with the necessary expertise.

The New Zealand review uncovered concern that macro-appraisal would require more resources than existing models. It has been argued in Canada, however, that macro-appraisal is a more efficient and effective use of resources, with the increased coverage and quality of the archival record identified outweighing any extra resource requirements.

Agency Support for Change

Successful implementation of a redefined appraisal programme is largely dependent on the support of government agencies for the change. Agencies will have to rethink their expectations of the appraisal programme, along with archives. A key factor enabling the National Archives of Canada to successfully introduce macro-appraisal was the level of agency dissatisfaction with the previous appraisal practice. From an agency perspective, there were serious issues in respect of response times to appraisal submissions, with backlogs of submissions growing.

Agency commitment is assisted by clear specification of the expectations on agencies, of the time frames, and of the outcomes of collaborative work. An advantage of the planned approach to disposition is that it enables agencies to budget for their participation in collaborative projects, both direct costs and staff time.

Agency senior management engagement and advocacy is important. Use of agency chief information officers, and deputy ministers to support policy decisions characterize Canadian approaches.³⁰ Further support in the Canadian

29 Appraisal Review Committee (ARC), State Archives Service of South Africa (SASA), “Report on Current Appraisal Policy,” 3.2.3.2.

30 The Canadian Government *Policy on the Management of Government Information Holdings*, issued by the powerful Treasury Board Secretariat, available at <http://www.tbs-sct.gc.ca/Pubs_pol/ciopubs/TB_GIH/CHAP3_1_e.html> (accessed 10 June 1999), requires agencies to “designate a senior official to represent the deputy head to Treasury Board Secretariat and other central agencies for the purposes of this policy” and notes that “the National Archives has specific evaluation responsibilities on behalf of the Treasury Board Secretariat in regard to this policy.” The importance of “support from senior executive stakeholders” is also noted by Richard Brown, “Macro-Appraisal in Transition: Recasting the Government Records Disposition Programme of the National Archives of Canada,” paper to the Annual Conference of the National Association of Government Archivists and Records Administrators, Sacramento, July 1997, p. 5, and Verne Harris, *General Report: Visits to National Archives of Canada in Ottawa (4–15 December 1995) and Public Record Office in London (18–19 December 1995)*, State Archives Service of South Africa file reference B17/3/4, 8 January 1996, paragraph 3.2.3.7.

environment has been found in the Information Commissioner, the advocate under the *Access to Information Act* on behalf of public access rights – and an office-holder who has been particularly outspoken recently in Canada on the poor state of government record-keeping.

Such allies will not necessarily be available. While chief information officers are becoming more common, many agencies in the New Zealand public sector do not have such officers. Frequently there is no senior position with responsibility for information or records. Typically, records management is seen as a responsibility of a low-ranking officer, with the senior information management position being that of the information technology manager. Only recently, since being given the status as a public service department in its own right, has Archives New Zealand started to gain access directly to chief executives, with the Chief Archivist able to talk to them as equals. Further, as each agency is a separate employing authority, the Archives has no mechanism for influencing the job description or incentive remuneration of staff in other agencies. The New Zealand ombudsmen have been reluctant to take a strong stand on record-keeping standards, preferring to emphasize their role of adjudication in disputes over access to official information.

Agency concern as a lever for change cannot be assumed. Waiting times are not a significant issue in New Zealand at present (unlike the situation in Canada before the introduction of macro-appraisal). This was not always the case, and was one of the factors used as a reason for transforming the provision of appraisal in New Zealand into a contestable, market model. The agency is free to source appraisal services in a commercial market, so the availability of Archives New Zealand staff and limitations of the Archives' resources do not cause a bottleneck in the process. Similarly, the establishment of a service standard of ten days for consideration of appraisal reports submitted has prevented frustration at the responsiveness of the institution. Timing is largely now in the hands of the agency itself.

Independence and Political Will

For a public archives to fundamentally change its appraisal methodology substantial independence or political support is required. It is therefore necessary to look at the accountability mechanisms which exist. In the New Zealand public sector, agencies receive funding as part of a purchase agreement with their vote minister, which specifies the outputs to be delivered. Any fundamental change to the appraisal methodology would be likely to have an impact on the measures of these outputs (the "statements of service provision") and thus require approval at the ministerial level. Political will is required as well as institutional will to make such a change. The status of the archival institution and its reporting arrangements to a responsible minister are likely to affect the ability to communicate effectively at this political level.

The New Zealand “appraisal market” not only creates some unusual difficulties in carrying out effective and efficient appraisal, it also creates peculiar barriers to implementing change. The institutional dependency on the revenue generated by appraisal (the “revenue addiction”), limits the ability of the institution to commit resources to non-revenue-generating activity, such as the broad functional framework mentioned above.³¹ Indeed, it creates a situation where the incentives for the appraisal staff of the Archives are not connected to the quality of the records appraised.

The New Zealand government has been committed to increasing the extent to which services traditionally seen as government services are delivered by the private sector.³² This philosophy has seen the establishment of a role for private sector providers in the field of appraisal, which also limits the ability of the Archives to unilaterally redefine the appraisal regime. While the political climate has changed significantly in the last eighteen months, for widespread acceptability in New Zealand it is likely that macro-appraisal would need to be reconciled with possible private provision, including a need to identify methods of allocating funding to such projects, and of assuring the quality of work.

Context of Implementation

Implementation of major initiatives such as macro-appraisal requires a relatively stable environment. Where other issues absorb the energies of the organization, it may be difficult to effect the desired transition.

South Africa faces the interesting paradox that the changes which made macro-appraisal possible, and the historical situation which made it necessary, have also created difficulties for implementation. A number of agencies, particularly the security establishment, had resisted the involvement of the Archives with their records under the apartheid regime. At the same time as macro-appraisal was being introduced, the Archives had to respond to the need to get intellectual control over these records which had been beyond their reach previously, and to react to massive restructuring in areas such as local government.³³

The concerns in South Africa went well beyond the appraisal process, however, and indeed beyond the Archives. As part of the democratization of South Africa, new archives legislation was developed, and a review of appraisal was able to be linked into the consultative process which led to the *National*

31 Roberts, “Market Forces.”

32 “The New Zealand Government’s Goals and Priorities 1999–2002,” available at <http://www.dpnc.govt.nz/publications/goals_and_priorities_1999-2002.html> (accessed 10 June 1999).

33 Harris, “Redefining Archives in South Africa,” p. 9 and e-mail to author, 10 May 1999.

Archives of South Africa Act. Verne Harris, then deputy National Archivist, noted, "It is no coincidence that the introduction of macro-appraisal and the implementation of the new Act occurred simultaneously."³⁴

The South African experience reminds us that changes to the appraisal regime will only ever be one of the changes occurring in any given public sector, and implementation can be helped or hindered, or both, by those changes. Attention and energy can be drawn to the Archives by factors not directly related to appraisal; similarly, agencies can be distracted by issues external to archives. Indeed, archives are traditionally a low profile issue likely to be given low priority in the face of competing change agendas.

Ongoing Issues

Certainty and Risk

Issues surround the level and nature of risk in using the macro-appraisal methodology. This risk to robust appraisal of records has two key dimensions: first, at the point of connection between the criteria and the real world; and second, at the point of connection between the appraisal analysis and the records.

The first has been explored in some depth by Richard Brown, who identifies the risk that the sources used in the research may reflect a formal or official view of the world which bears little relation to the underlying reality.³⁵ More generally, incomplete, inaccurate, or otherwise inadequate resources may constrain the ability to properly understand the reality being evaluated and apply criteria to functions or structures as intended. The more significant the role played by metatext of annual reports, policy statements, legislation, and such formal documents in the construction of an appraisal framework, the greater this risk. While macro-appraisal has always recognized the need to question the validity of this metatext, the approach will be best suited to environments which are transparent in their self-description and accurate in their self-representation.³⁶

The second area of risk is that of potential difficulty in applying the methodology to records. This risk is arguably heightened in any appraisal regime where a significant feature of the analysis is an evaluation of a functional hierarchy rather than records themselves. While the macro-appraisal methodology does require the examination of records, this is to test, rather than construct,

³⁴ Harris, e-mail to author, 10 May 1999.

³⁵ Richard Brown, "Macro-Appraisal Theory and the Context of the Public Records Creator," *Archivaria* 40 (Fall 1995), pp. 123–24.

³⁶ This area of risks manifests in a slightly different form where appraisal is predominantly based on examination of records – the risk of accepting the record at face value without question.

the appraisal hypothesis. Where appraisal decisions are grounded in functional analysis, application of these decisions to any record-keeping system not based on the same analytical framework introduces potential discrepancy between result and intention. This risk, it should be noted, is a result of the disjunction between the basis of the records classification and the appraisal criteria, and can be managed by ensuring that record-keeping systems themselves are based on a functional model, as in the National Archives of Australia's approach.³⁷

Whole-of-Government Thinking

A defining feature of macro-appraisal is its whole-of-government vision. Macro-appraisal was developed with the objective of identifying the best archival record across the whole of the Canadian (i.e., federal) public sector. It is designed to deliver results to the government on behalf of Canadian society. For success, agencies need to collaborate to achieve its aims. It appears that there is much greater commitment to ideas of a unified public sector in Canada than is evident in New Zealand. Such a paradigm is a vital, if difficult to quantify, support for initiatives such as macro-appraisal, and indeed for archival programmes in general. Where agencies see themselves as independent entities, there can be resistance to proposals such as the introduction of comprehensive coverage. Agencies come to believe that they alone are responsible for their own records (and, as a corollary, see that their management of them is no one else's business).

There is some evidence that this situation may be changing in New Zealand. The current government has in its rhetoric put increasing emphasis on the idea of collective interest of government. Its e-government programme is confronting the fact that interoperability and efficiency across departments requires some overarching standards and central controls on agency discretion.

A key factor in continued success in Canada has been the ability to obtain and keep agency commitment. Macro-appraisal is "viewed as a collaborative/cooperative business effort in which the client is provided authorisation to dispose of records in compliance with federal laws and policies including by transfer to the NA as required, and in which both "parties" involved in this process are expected to invest."³⁸ The conceptual framework of macro-appraisal relies on the top-down analysis of a target, an "Office of Primary

37 See National Archives of Australia, *Why Records Are Kept: Our Approach to Appraisal*, available at <http://www.naa.gov.au/record-keeping/disposal/why_keep/approach.html> (accessed 21 December 2001): "The AS 4390 model has several elements which we believe are now needed in the Commonwealth record-keeping regime. These [include]: ... functions-based classification as the means of control over records creation, management and disposal, reducing the risks associated with sentencing by third parties at a later stage."

38 Richard Brown, e-mail to author, 15 May 1998.

Interest.” This requires the cooperation of other structures or agencies within the portfolio or function, in order that the relationship between records created in varying offices can be determined, and the most concise record located for archival retention.

One of the strongest and most persistent criticisms of the New Zealand reforms has been this emphasis on outputs over outcomes,³⁹ on the individual agency rather than collective responsibility. A narrow emphasis on outputs leads agencies to put little value on anything which they do not see as contributing to their current business. Records no longer required become somebody else’s problem – that of the Archives. In terms of archival outcomes, the result is that agencies do not see selection and retention of an archival record as a shared aim, but as one for which the Archives is responsible. At the same time, however, New Zealand agencies are generally resistant to central control, and tend to view their records as their own assets, to be managed as they see fit, until such time as they are no longer of business value, at which stage they will seek approval to dispose of them.

The charging of individual agencies also imposes a barrier to collective, macro-appraisal approaches and to the development of general disposal schedules. The charging arrangements for appraisal mean funding for the selection process at the heart of the statutory disposal regime is in the hands of those with the least interest in the outcome, the agencies. For a collaborative approach such as macro-appraisal, a number of issues arise. There is a need, first, to get all involved agencies to agree to pay, and, second, to determine a fair and acceptable method of distributing costs. Many classes of records, particularly in relation to administrative activity such as human resource management or finance are consistent across agencies. While a general disposal schedule for such records would have clear value, the charging regime mitigates against the development of such a document. No single agency would want to subsidize such a project to benefit others. Were the National Archives to undertake the work, they would be confronted with several problems: how to allocate costs, and how to persuade agencies to pay (the most obvious).⁴⁰ Given this, there would likely be criticism for exposing the Archives to business risk.

Such situations demonstrate a tension between an agency’s own interests and the collective interests of the government (the Crown), or of society as a whole. The New Zealand reforms have emphasized the former, with agencies being encouraged (until recently) to see themselves as providing a particular

39 “Outputs are the goods and services purchased by Ministers ... Outcomes are the impacts on the community of an output or class of outputs,” The Treasury, *Putting It Together* (Wellington, 1996), pp. 13–14.

40 Possible licensing arrangements have been occasionally discussed as a means of addressing this issue.

service to government, a service delivered in a contractual relationship with its vote minister. Agencies will have an interest in creating and maintaining sufficient records to carry out their business efficiently and effectively and accept a certain level of need to be accountable. This generally takes two narrow forms: financial accountability, and proof that they delivered the services specified in the purchase agreement. These accountability requirements are seen as relatively short term, and contrast with the broader sweep of the definition of accountability found in record-keeping literature and theory. Here, too, there is evidence that the pendulum is starting to swing back towards a broader understanding of accountability, and a sense that departments are part of a collective whole, rather than just contracting businesses.

Legislation

Any archival appraisal regime will be influenced by the archives legislation under which it operates, and to which it is expected to give effect. First, it should be noted that macro-appraisal presupposes that the Archives has a mandate for its role in selection. This may not always be the case: distrust of the State Archives Service appraisal practice in post-apartheid South Africa was such that some recommended “that the appraisal function be taken from public archives and given to independent boards comprising academics and other ‘stakeholders’.”⁴¹ The South Africans suggested that a strong legislative mandate in the area of records management is also required, as such a mandate would be necessary to compel comprehensive disposal submissions, and to avoid being involved only in reactive appraisal when agencies wish to dispose of records.

The nature of legislative provisions sends a strong signal regarding the purpose and basis of appraisal, and of responsibilities within the appraisal regime. The New Zealand *Archives Act* mainly provides for appraisal through the regulation of disposal – specific provisions focus on evaluation of material proposed for transfer to Archives or destruction. This has encouraged a reactive, fragmented approach to appraisal. This contrasts with the requirement in the *National Archives of South Africa Act* for appraisal policy to be approved and monitored by the National Archives Commission, which provides a statutory incentive to articulate clearly the basis for appraisal at a high level.⁴²

Legislative change is a powerful catalyst for policy or methodological development. Canada also had new archival legislation in 1987, shortly before implementing macro-appraisal. There were also strong links between macro-appraisal and the introduction of privacy legislation. Legislative change thus

41 Harris, “Redefining Archives in South Africa,” p. 16.

42 *National Archives of South Africa Act 1996*, section 6 (4) (e).

both alters the statutory requirements on agencies and also reflects the willingness of government to change the way in which it manages records. New archival legislation further suggests a level of political interest in archives conducive to changes at a policy level, such as the introduction of macro-appraisal. Work is well advanced towards new public records legislation in New Zealand, and it is hoped that this will both support more flexible approaches to appraisal and signal that government places importance on creating and preserving a record of its activity.

Conclusion

While macro-appraisal appears well suited to tackling practical problems which are widespread results of implementing a Schellenbergian, user-driven appraisal methodology, there remain serious issues for any regime considering its adoption.

The most fundamental of these is the theoretical position on which it is based. Macro-appraisal is firmly anchored in a set of theoretical assumptions about the purpose of appraisal, its relationship to record-keeping and archival theory, and about the sources of value in archival documents. These positions are not incontestable, and yet are fundamental. While the detail of the implementation may vary according to circumstances, the underlying theory must be retained. The degree to which this is acceptable in a given context will depend on the particular experiences of that environment. For South Africa, a model based on a societal attribution of value was readily acceptable, where in some other socio-political climates it may not prove to be the case.

It is difficult to be unequivocal about the applicability of macro-appraisal in New Zealand. There is nothing in the New Zealand experience to suggest that the function-centred, top-down focus on citizen-state interaction would not provide a comprehensive and robust theoretical basis for evaluation of the New Zealand public record. However, the lack of widespread engagement with the questions of value underpinning the approach raise questions about its immediate acceptability. While the model may indeed be applicable – even desirable – it may also be hard to apply.

Where the underlying basis for appraisal is accepted, there remains the need to actually implement the methodology. Here again, factors may constrain the ability of the archival institution to make this decision. Dissatisfaction with the existing situation on behalf of agencies or a broader climate of change have been effective levers for change. Well-positioned allies within agencies are valuable in ensuring the cooperation required. However, difficulties arise particularly where the archives has limited independence to re-engineer its activities. This could be grounded in financial, political, or skill constraints: paradoxically, the same changes which enable macro-appraisal may draw on resources and distract the archives from being able to take advantage of the

opportunity presented. These difficulties would likely be more pronounced in a smaller institution.

Despite the appeal of macro-appraisal as a response to pressing practical problems of appraisal practice in many institutions, it is clear that there are many limitations that could prevent it actually delivering improvements. Macro-appraisal is developing in response to these emerging problems, for example, by refining its use of multi-institutional disposal authorities, and minimizing the documentation burden. Its advocates remain convinced that it provides the most defensible and practical approach to appraisal in a modern government environment. However, it waits to be seen how successful it will actually prove in the long run, both in its original Canadian setting and in other jurisdictions.

These unresolved questions should not be allowed to detract from the value of considering foreign models when developing local solutions. Record-keeping communities will always need to reflect on their own political and social contexts in shaping their models, and it is only through such analysis that the strengths and limitations of particular approaches can be understood. Such thinking, coupled with genuine conversations between representatives of different archival traditions, will help distinguish practice from theory, test claims of universality, and strengthen our professional frameworks.