

THE NATIONAL ARCHIVES

APPRAISAL POLICY

BACKGROUND PAPER – THE ‘GRIGG SYSTEM’ AND BEYOND

Introduction

The report of the Royal Commission on Departmental Records chaired by Sir James Grigg was the basis of the Public Records Act of 1958 which ended the haphazard legal position as regards duties of custody and disposal of ‘public records’. The Act defined ‘public records’, it assigned duties between the PRO and departments and within departments regarding custody and control, and it determined timings of transfer of historical records to TNA (at 30 years) and rights of public access (50 years amended to 30 years in the 1967 Act). In addition to these statutory responsibilities the Grigg report proposed a system for the review of government records which still obtains today¹. The key elements of that system were endorsed, with reservations, by a subsequent Committee of Inquiry chaired by Sir Duncan Wilson in a report published in 1981².

The current project, through analyses of alternative systems of review and appraisal, has similarly found that the Grigg system has been outstandingly effective. It has enabled departments to manage their records effectively and has provided an ordered mechanism for the transfer of records to the archive. Close contacts have been developed between TNA and departmental records staff, allowing each to voice and respond to the concerns of the other. TNA is a very compact archive: at 190km for an archive spanning nearly 1,000 years of continuous record-holdings by a government which controlled an empire for nearly 300 years³. TNA is manageable, records can be readily located and their context is well-explained in the catalogue.

A summary of the ‘Grigg system’

The ‘Grigg system’ has two main elements: a system of timing and procedures recommended by Grigg and then implemented by TNA and departments; and the advice and guidance given by TNA on how reviewers were to assess the value of records.

The Grigg system

- a) All registered paper files, except case files, are closed after a maximum of five years;
- b) Five years after a file has passed out of active use departments (either the business users or the departments’ records centres) carry out “first review”

- at which they decide whether the file has any continuing administrative value to the organisation or could have administrative value in the future. Files may be destroyed immediately or earmarked for destruction without further review after a stated period;
- c) 25 years after a file was created (supposing it survived 1st review) reviewers in departmental records centres, under TNA supervision, carry out “second review” at which they decide whether the file has ‘historical’ value. Those that have are transferred to TNA.
 - d) ‘Case files’ (today a term which includes datasets) are dealt with outside the system of review. Grigg proposed that all case files created across government be appraised as a whole, enlisting historical advice;
 - e) Specific guidance applies to unregistered files, such as private office papers, films, sound recordings;
 - f) TNA advice on how to decide what records are of historical value has been given in various manuals for departments and, more recently, through the Acquisition and Disposition Policies and the accompanying Operational Selection Policies (OSPs);
 - g) The Grigg Committee, the subsequent Wilson Committee, and subsequent TNA advice all emphasise the need for good systems of records creation and the extensive use of disposal schedules.
 - h) The timing of disposal for common administrative records is closely regulated in many departments by disposal schedules, supported by general guidelines provided by the TNA for classes of administrative records, such as accounting records, legal records, personnel records, estate records etc.

Determining the value of records

A central element in TNA’s appraisal system has been guidance to enable reviewers to judge the value of records, especially ‘historical value’. TNA, in common with most archives around the world generally adopted the taxonomy of value developed by an American archivist, T.R. Schellenberg. He argued that a record has two different layers of value - a primary value or the value to the organisation that created them and a secondary value to historians. ‘Primary value’ consisted in the value to the organisation for administrative, legal and fiscal purposes of records and ‘secondary value’ consisted in value to other users, to historians, value that was never intended by the creator. And within secondary value, there was ‘evidential’ value – a value derived from the way the record documented the history structure and functions of an organisation and ‘informational’ value or value in providing research material on persons, places and subjects⁴.

In practice, at 1st review the main criterion is administrative need for departmental purposes supplemented by two caveats made in the Grigg report: that 1st review should take place as soon after closure of the file as possible thereby ensuring more records are retained; and that at first review consideration be given as to

whether the function being carried out might arise again in the future, for example, rationing. In addition, the TNA advised that in a few cases the records' possible historical value be taken into consideration at this stage⁵. Subsequent checks have indicated that historical material was not being discarded, thus allowing only records with potential 'historical' value or continuing business value to be stored.

For 2nd review TNA has used Schellenberg's taxonomy in training sessions and in various forms of guidance. Hence the orange *Manual of Records Administration* defined two types of selection criteria for records – selection to show the significance of the functions and activities of the department or selection on the basis of the informational content of the records. The *Manual* further recommended that reviewers should provide material for research into:

- The history of the department, its organisation and procedures
- The formulation of policy and legislation and, more selectively, its implementation and interpretation;
- Notable events or person when the records add significantly to what is already know;
- Major events, developments or trends in political, social, legal or economic history;
- Scientific, technological or medical research and development;
- Regional or local conditions when it is unreasonable to expect information to be available locally, when it is convenient to hold it centrally, or when it is known that significant local information does not survive locally;
- Demographic, medical, social, cultural and economic history and historical geography, by means of statistical and quantitative research.⁶

This general guidance was supported by others which might list the types of documents which counted as of research value, drafts of Ministerial briefs, of Cabinet committee papers, records of meetings.⁷

In 1998 an additional area of advice was provided in the form of the Acquisition and Disposition Policies. The former is 'a statement of values to determine what is important' in TNA's acquisition work and it outlines eight collection themes which 'provide the basic definition of the archive'

<http://www.pro.gov.uk/recordsmanagement/acquisition/policy.htm>.

The Acquisition Policy defines the limits of the archive. It works in conjunction with the Disposition Policy which is a framework of principles on which to base decisions to offer public records to an archival institution other than TNA. <http://www.pro.gov.uk/recordsmanagement/dispositionpolicy/dispositionintro.htm>.

These two policies have been developed using OSPs. 28 of these exist which probably now cover 20% of the records accessioned into TNA each year. The OSPs have a content, information-based approach and may cover specific sets of case files (coroners' records), or disposal of all of the records of a department (Royal Mint) or may cover a theme such as recreational use of the countryside.

A final area to be considered is the treatment of case files. The Grigg Report recommended that a Committee be set up under the auspices of the PRO to conduct a census of what case files are in Departments; and “to determine what papers, if retained, would give the greatest amount of information in the smallest amount of space” and so “decide which papers, and in what quantities, should be preserved”⁸. This process was not fully developed in TNA, and case files, and, in today’s world, datasets, require specific attention.

Grigg in the modern day

The key driver in this current review of the Grigg system was the development of electronic records. The problems posed by these for TNA’s current systems of review may be described under three headings: the timing of Grigg, file by file review and case files.

For electronic records, it is inadvisable to wait five years before deciding what is of continuing business value or 25 years before deciding what is of archival value because the long-term preservation of records *in an accessible form to future generations* is far from cost-free. In addition computer records may be destroyed inadvertently or by virtue of rapid technological change before appraisal takes place; and information about the records, on which appraisal rests, may be lost once they are inactive. These difficulties are compounded by new ways of working such as ‘virtual teams’ and briefly existing working groups, often outside formal structures, geared to joining up various strands of government work. To sustain electronic records over time clear thought must be given at a very early stage as to exactly which records are needed for business use and for archival use, and specific arrangements made for those records.

The review of electronic records for content presents great difficulties. For paper records, their content as well as information about their creation and provenance, may be readily deduced through the file cover or through an initial scanning of the documents. For electronic records the physical appearance of the records consist of several components not all of which are visible to the user: the data and information content itself, the software, hardware, storage medium and metadata. Hence ‘a record is no longer a physical entity, but physically fragmented, kept only together by a logical boundary’⁹. There are not the visual clues which aid assessment of content in the paper world: drafts in the electronic world can look as finished as the final version.

Finally, datasets create new problems, for they may not be simply the electronic equivalent of paper case files. They may be used to capture not just one function but many: organisations may ‘combine their resources to create and maintain a single large system or database which can serve all their diverse but related needs at once’¹⁰; in such a situation the difference between active, semi-active

and inactive stages of records becomes difficult to determine and makes provenance and hence appraisal decisions very difficult to determine.

In addition to problems posed by electronic records, there is the need to develop policies to appraise hybrid records, where documents which 'belong' together are held either in paper or in digital form, and to provide for the continuing increase in the volume of paper records into the 1970's, and possibly beyond, a problem probably created by the photocopier and similar copying techniques.

Functional appraisal

If the Grigg system does need modernization, does the system of functional appraisal bring benefits? This section explains functional appraisal and considers its applicability to the UK system.

Theorists of functional appraisal criticise the method of assigning historical value used by T.R. Schellenberg, arguing that the emphasis on the value of records for historical research, the value therefore placed on the information contained in the records, ties the archivist 'too closely to the academic market place' so that archivists are in danger of being 'nothing more than a weathervane moved by the changing winds of historiography'.¹¹ They therefore see systems of review as being inherently fragmented.

For proponents of functional appraisal, records are the products of business processes and have no intrinsic value other than the reasons for which they were created and the functions they were intended to fulfil. Records are primarily forms of evidence of the creator's use and it is the status of records as evidence that 'endows them with objectivity for the archivist'. The more important records were to creators 'the more we take them to express what posterity might well ponder'.¹² Thus 'by documenting how government conducts its business, organises itself, delivers programmes and services and the manner in which this business is transacted...the (archive) will provide an accurate and comprehensive view of government's history'.
[http://www.archives.ca/06/061101_e.html.]

This leads to the promotion of the idea that appraisal should judge the relative importance of the functions exercised by a department as a whole and identify the types of documents needed to illustrate that, rather than judge the relative importance of the subject matter on specific files.

This idea has been developed in various forms by many national archives: their ideas may be summed up by the statement of the National Archives of Canada that: 'Archivists must first undertake an analysis which asks not what records have been produced, where they are and what research value they have, but what should be documented and what records creators are therefore the most important?' http://www.archives.ca/06/0611_e.html

There are practical reasons for exercising caution in adopting this approach in the UK context.

First, in practice British government reviewers and TNA have always been aware of the vital importance of 'provenance' in assessing the value of a record, that is whether the area of activity documented on the file was a primary function for the business unit which created the file. Good appraisal has always consisted in setting the content of the file in its departmental context, to assess whether it simply duplicated material elsewhere or whether it added substantially to the historical record. Provenance has been a major element in TNA's decision-making process for records and the prefix or descriptor of the records series is a common thread running through creation, use, appraisal and archival transfer of files in the UK system.

Secondly, the practical superiority of the method is not proven. The process of defining functions is time-consuming, yet departmental reviewers must still make decisions about specific records, and these may be subjective. There are also difficulties matching functionally-based appraisal authorities to organisation/subject-based government filing systems.

Thirdly, the functional approach has generally originated in response to situations where the sheer volumes of records for archival appraisal are vast. In Britain this volume is early made manageable through 1st review, making second review a controlled procedure.

Fourth, while selection based on function may certainly be a route to 'provide an accurate and comprehensive view of government's history', TNA has traditionally made the documentation of government functions and activities one element in a wider list of areas to be captured, as described above. Today, the requirements of TNA's Acquisition and Disposition Policies and TNA's commitment to social inclusion and wider social uses of the archive dictate archival criteria which go beyond the assessment of functional significance only. Further discussion of this element is below under 'Creating an Archive'.

Finally functional appraisal is difficult to apply to case files, which is a major type of government record. Case files need to be closely assessed because of their storage implications and this involves probing consideration of their future value. The answer is likely to depend crucially on anticipated research value, and therefore on the content of the record and whether it is duplicated in a more comprehensive or researchable form elsewhere.

These arguments imply that TNA should not adopt functional appraisal in preference to the Grigg system. However, there are some practical advantages which can usefully be absorbed.

First, in the context of electronic records, the analysis of functions allows at least for preliminary decisions to be made about the value of records without the benefit of hindsight and without studying the content.

Secondly functional appraisal encourages an analytical approach towards records and insists on analysing all records and records series in the context of government as a whole. It therefore seems to be an excellent mechanism for identifying where the records of highest archival value are likely to lie. It may also help to identify possible sources of duplication, by analysing the overlapping functions of departments.

Thirdly, and as a corollary of the above, it is suited for identifying runs of files within a department most likely to be of historical importance. This can be used to reduce the areas where time-consuming file by file review is applied in the British context, or to identify where the most valuable case file material lies for any given function or organization.

Fourth, the system may be practical for the activities of smallish and discrete agencies. Here processes which occupy the bulk of the budget or the personnel of the agency prove relatively easy to identify and case files, for instance, may quickly be placed into context and disposition decided. It is therefore worthy of consideration as a first step in the appraisal of the agencies and NDPBs which have been created in the last 15 years.

Finally, functional analysis of records may provide a tool for appraising 'hybrid' records. Such records, produced in the period after the introduction of the computer to departmental offices but before the introduction of ERMS, need to be targeted for appraisal in the near future before information about their creation and storage is lost and to assist departments in identifying records for migration to ERMS.

Creating an archive

In the course of its history, TNA has moved from being the passive recipient of records documenting the Crown's rights and obligations, to being an active creator of an archive which is consciously to be used for historical research. This has prompted the gradual development of two elements in the work of TNA: the establishment of criteria guiding the selection of archival material and an interest in the way records are managed within departments, including records creation and business disposition, both of which impact on the methods of archival appraisal.

The principles on which archival material is to be selected have been laid down in past TNA guidance: selection to show the significance of the functions and activities of the department and selection on the basis of the informational content of the records. Functional appraisal rejects or downplays the second of

these because its proponents stand for the principle that selection should be impartial and allow the records to speak for themselves. Given that the primary nature of a record is its 'official character': that records were created 'as part of an official transaction and were preserved for official reference'¹³, it follows that an impartial method of selection is to reflect purely that official character.

The problems of implementing the full functional approach have been noted above but TNA recognises the need for impartiality and for transparent and consistent selection criteria. It recognises the strengths of the purely functional approach in circumstances of large quantities of records or poorly managed records: indeed in the course of developing new methods for electronic and hybrid records it is conceivable that the functional approach will become dominant. TNA also recognizes that the extent to which records document the functions and activities of government must be a primary element in the appraisal process.

But experience within TNA indicates that documenting functions and activities alone is not a sufficient condition to guard against either the selection of material which can have no research use, or the rejection of material which has research use, for instance through illustrating changes in social attitudes. Thus, the traditional TNA selection guidance will continue and records will be selected both for their value as evidence of government transactions and/or for the information they contain.

However, these guidelines do not define archival value closely enough, for all records can be deemed of potential archival value, no matter what criteria are stipulated. An archive must be able to preserve and conserve records permanently and must therefore limit its acquisitions to records of the *highest* archival value. To achieve this, it is necessary to apply two further elements to the criteria for archival appraisal.

The first stipulation derives from consideration of the primary role of the archive today and for the conceivable future: namely to provide the raw material for historical study. Historical study is the study of change, continuity and development and material of the highest archival value is that which is most capable of documenting such change and/or assisting historical interpretation of change, continuity and development.

The second stipulation is that records of the highest archival value are those which document not just the functions of departments in isolation, but the functions of government as a whole as they are represented within departments. Traditional methods at TNA have focused on the organization, or even on the records series in isolation from related organizations or records series. Decisions have therefore been premised on assumptions about what records would be selected from other records series or departments without establishing that to be the case. By documenting the functions and activities of government, TNA can

develop methods which allow for cross-departmental analysis of records according to the associated functions which they fulfill. This will also help to reduce duplication in the material selected for the archive by considering the functions and the records of each organization in the context of other related functions and hence related records.

Turning to the second element in the creation of an archive, namely good systems of records creation and management, one of the most important results of electronic records is the renewed emphasis which is required on robust systems of records creation, and controlled methods of filing, storage, and naming of documents and files. TNA has provided guidance on suitable types of file plans to support this need and will provide in the future guidelines for the filing and naming of documents and files.

Conclusion

These assessments have been made in the course of the Appraisal Policy Project and are the essential underpinnings of the Appraisal Policy, together with its appendices. They indicate that it is possible to move forwards for records in all formats through a process which does not abandon proven systems or broad measures of archival value, but utilizes some of the insights of functional appraisal to develop analyses of government records. In particular such analyses are likely to lead to an emphasis on differentiating between different types of records: between different types of government departments, between different types of records (case files, policy files, datasets) and between the functions represented in different types of records series.

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¹ *Committee on Departmental Records. Report.* (1954) Cmd. 9163.

² *Modern Public Records Selection and Access. Report of a Committee appointed by the Lord Chancellor* (1981) Cmnd. 8204

³ This compares with, for instance, the National Archives of Australia (264km) the Canadian (100km), the Norwegian, (105km).

⁴ T.R. Schellenberg, *Modern Archives. Principles and Techniques* (Chicago: University of Chicago Press, 1956); T.R. Schellenberg, *The Management of Archives* (New York: Columbia University Press, 1965)

⁵ PRO Government Services Division *Manual of Records Administration* August 1993, para 3.3.6. Grigg actually states that the terms 'for its own Departmental purposes' be interpreted to cover 'the likelihood of the paper being required as a precedent or as a guide to possible action should a similar set of circumstances arise in the future.' Such a proviso would catch records showing a Department was organised in order to carry out a set off policies or procedures or it might stop the destruction of papers because the activities they dealt with had ceased, such as rationing.

⁶ *Manual* para 3.6.11

⁷ *Modern Public Records* Appendix 6.

⁸ *Departmental Records* para 109.

⁹ Hans Hofman *Dealing with electronic records: intellectual control of records in the digital age* Janus 1998.1 p.155.

¹⁰ Catherine Bailey *Archival Theory and Electronic Records* Archivaria 29 (Winter 1989-1990).

¹¹ F. Gerald Ham 'The Archival Edge' in Maygene F. Daniels and Timothy Walch (eds) *A modern Archives Reader* (Washington, 1984) a reprint of an article first published in 1975, cited in Terry Cook 'Mind over Matter: Towards a New Theory of Archival Appraisal' in Barbara L. Craig (ed) *The Archival Imagination. Essays in Honour of Hugh M. Taylor* (Ottawa, 1992) p. 4.

¹² Terry Eastwood 'Towards a Social Theory of Appraisal' in Craig pp.71-85

¹³ This early formulation of a 'functional approach' is taken from Hilary Jenkinson *A Manual of Archive Administration* Oxford: 1922, p.4.