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ACCOUNTABILITY AND RECORDS APPRAISAL

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Abstract

This article endeavours to highlight a variety of issues around accountability and appraisal and does so from the perspective of parliamentary systems of government. These include many African countries as well as Australia, Barbados, Canada, India, New Zealand, the United Kingdom (UK). This should be an appropriate perspective as existing literature, with the exception of that from Australia, has relatively little to say about the role of parliamentarians and political parties (Hurley 2005; McKemmish 2005).²

Keywords

Accountability, appraisal, functional analysis, records retention and disposal schedules, risk management, vital records

Introduction

In recent years, amongst established scholars in North America, Australia and the UK at least, there has been a noticeable falling off of interest in the relationship between accountability and record keeping (Ketelaar 2010). In African countries, however, a continuing focus on the contribution that record keeping professionals can make to public sector reform, rule of law, good governance and related programmes makes it timely to consider the relationship between accountability and appraisal, in other words the retention and disposal of non-current records. It is noticeable that much of the literature on accountability tends to be written from a primarily North American and Western European cultural perspective. Harris, himself from South Africa, observed of a conference on political pressure and the archival record in 2003 that among the keynote speakers there was “not a single person who was not white” (Harris 2005:173). Cox explicitly acknowledges that he writes from a North American perspective (Cox 2006: xiv). In the meantime, the International Records Management Trust (IRMT) has carried out a great deal of work on accountability and record keeping from the perspective of developing countries, particularly through their Information for Accountability Workshops (IRMT 2000). The impact of this work on thinking in the Western World has been limited.

Accountability

It is not easy or straightforward to define accountability. Cox and Wallace (2002) build their work on a definition produced by Kevin Kearns, a professor of management. They state:

In his view, accountability meanders through “legal and regulatory mandates”, “negotiating with ... clients, special interest groups and other stakeholders,” “discretionary judgements, calculated risks, and entrepreneurial ventures,” and finally, advocacy involving the need to “interpret and communicate the needs of citizens to higher authorities who have the power and resources to meet those needs (Cox & Wallace 2002:3).

They add that whilst Kearns “does not explicitly discuss records (he mentions “red tape” and information systems), it is our contention that the chief value of records is, in fact, a broad

accountability binding individuals with each other and with governments, organizations, and society across space and time” (Cox & Wallace 2002:3).

It has been argued elsewhere that it is helpful to have a definition of accountability that is more directly related to record keeping concerns (Tough 2007). In particular, there is a distinction to be made between probity and responsibility, between doing things right and doing the right things. In this view, probity should be about ensuring that public property and funds are used honestly and protected from being siphoned off for private gain. Responsibility, in contrast, is about making the correct decisions on matters of public policy. Academics and others with an interest in record keeping have addressed the distinction between probity and responsibility and suggested that supporting probity is primarily a matter for records managers whilst ensuring responsibility – primarily in the long-term judgement of historians – is a matter for archivists. Michael Moss (2006:63) argues “... the public ‘archive’ fulfils an essential juridical role within a democratic society as the fiduciary guardian of the record of government by which it ... [can] ... be judged to have acted responsibly ...”.³ Angelika Menne-Haritz, Director of the Federal Archives in Germany, addresses the same question saying: “Records managers and archivists do not have the same duties. ... Processes can either be supported or analysed” (Menne-Haritz 2006).

It could be argued that this distinction between probity and responsibility is mirrored in recent developments in the UK where records of routine business are now supposed to be managed through electronic document and records management systems (EDRMS) under the eye of the Departmental Record Officer whilst the most sensitive records are cared for separately in continuing registry systems to which few record keeping professionals have access.

It is unfortunate that in discussing definitions, Cox and Wallace (2002) do not discuss what the public good is and/or what communal benefits are. Considering the title of their book – *Archives and the public good* - this may seem surprising but they are not alone in the oversight. This may help to explain why writing on records and accountability has had a tendency to focus on scandals, grievances and compensation (See Hinsley 1993). The politics of grievance can have a tendency to become corrosive. Fortunately, an alternative perspective is offered by Bovens (1998) and O’Neill (2002a). Bovens (1998) emphasises the important distinction between active and passive responsibility. O’Neill (2002a) has developed this perspective further arguing that demands for accountability unrestrained by active citizenship can lead to the creation of an audit culture. The audit culture she argues is characterised by dwindling trust and grievances and claims for compensation that are sometimes poorly grounded.

The challenge of trust and suspicion was directly addressed by O’Neill (2002b) in her Reith Lectures of 2002. She suggests that “... the culture of accountability ... actually damages trust rather than supporting it”. This is because “... it assumes a passive view of human life and citizenship.” Referring to the philosopher Kant, she argues that we need to see “... duty as the basis of rights and justice.” This she regards as offering a more productive approach than the “... new accountability...” which requires “... detailed conformity to procedures and protocols, detailed record keeping and provision of information in specified formats and success in reaching targets.” O’Neill (2002b) offers a positive vision for a better way forward.

Intelligent accountability, I suspect, requires more attention to good governance and fewer fantasies about total control. Good governance is possible only if institutions are allowed some margin for self-governance of a form appropriate to their particular tasks, within a framework of financial and other reporting.

A similar orientation has been expressed by Andrew Chenge (1998), writing about human rights in Tanzania, who states "... there can be no true democracy in a country where the majority of the people do not know their rights *and duties*" (our italics).

An interesting example of active citizenship in relation to record keeping is provided by the Care Leavers Association in the UK. Their CLEARmark scheme awards accreditation to local authorities, Non Governmental Organisations and others for good record keeping (Care Leavers Association 2008). This is just one aspect of the work of the Care Leavers Association, a mutual-help association of people who were brought up in care and who provide support to children in care and to adults, especially the survivors of physical, sexual and emotional abuse.

In thinking about accountability, a key question is who is being held to account. It seems reasonable to propose that it is much more important that top rank politicians (Prime Ministers, Cabinet Ministers, ministers in provincial, state and devolved administrations) are accountable than that park rangers or even local authority chief executives are held to account.

When and how accountability is realised are crucial issues also. Arguably, ill-conceived attempts at openness have backfired. The former British Prime Minister Tony Blair whose government was responsible for introducing Freedom of Information [FOI] legislation now regards this as being the case (Blair 2010:127). In the UK, over the last decade these developments have had a significant and negative influence on record keeping at the highest levels because they have inhibited top rank politicians from supporting the creation of full and accurate records through the formal machinery of government. Presciently, Todd (2005: 319) flagged this up by posing the question "In our determination to hold our political representatives accountable in the short term, are we losing something more precious: the ability to judge them with due reflection?"

During the same period, the general focus of accountability and its attendant media spotlight has shifted away from those who make the key policy decisions and towards those responsible for making those policy decisions effective. In other words, the overall pattern does appear to be one in which an FOI regime and greater openness in government have tended to shift attention down the political pyramid. In this context it is apposite to recall Hurley's comment, based on his experience as Keeper of the Public Records of the State of Victoria: "... government watchdogs are susceptible to subtle pressures to compromise their integrity. Their organisational budgets and personal career prospects lie in the hands of those whose political interests such a role calls them to defy" (Hurley 2005:165).

Cabinet government and parliamentary democracy

The existing literature on records and accountability includes a good many case studies in which secrecy is described as having been used to deny rights, manipulate public opinion and otherwise abuse privilege (Cox & Wallace 2002:1-18; McKemmish 2005; Whorley 2005). Todd (2005:314) comments that there "are many dramatic and disturbing tales to tell about secrecy and repression". Countervailing evidence is rarely produced. Perhaps this is a natural concomitant of secrecy. Yet such evidence is not impossible to find. For instance, the work of the code-breakers at Bletchley Park during the Second World War was conducted in absolute secrecy because the Nazi regime would assuredly have changed their Enigma system if they had reason to believe it could be de-coded by their enemies. The successful maintenance of secrecy in the code breaking project shortened the war in Europe by a significant period (Hinsley 1993).

The implicit hostility to secrecy that is observable in much records-related literature may be unfortunate. The need for a degree of confidentiality in the formation of public policy was

eloquently described in 1987 by Sir Patrick Nairne, formerly Permanent Secretary at the Department of Health and Social Security in Britain. Nairn argued that the existence of a parliamentary system should impose restrictions on any FOI regime. “The Government is responsible ... through the accountability of the Cabinet and individual Ministers to the elected Parliament. The House of Commons ... will expect Government decisions ... to be disclosed *first* to the House” (Nairne 1987:43). In other words, new policy initiatives should be announced in Parliament first and be debated there rather than through the media via government-inspired leaks.

Nairne (1987) argued also that there must be some private space where policy options are discussed and alternative possibilities are evaluated and weighed. Although he quotes the Campaign for Freedom of Information⁴ as accepting this, evidence published by the BBC in 2010 suggests that in reality anxiety about the difficulties of securing such a space has led to widespread and systematic failure to create records (British Broadcasting Corporation 2010). The testimony of Tony Blair, former Prime Minister of the UK, is worth quoting *in extenso* on these matters:

... governments like other organisations, need to be able to debate, discuss and decide issues with a reasonable level of confidentiality. This is not mildly important. It is of the essence. Without the confidentiality, people are inhibited and the consideration of options is limited in a way that isn't conducive to good decision-making. In every system that goes down that path, what happens is that people watch what they put in writing and talk without committing to paper. It's a thoroughly bad way of analysing complex issues (Blair 2010: 217).

With the benefit of experience we might subject the arguments advanced by the Campaign for Freedom of Information, in particular the assertion that greater openness would lead to greater trust, to critical analysis. For ordinary people the rule of law and public order are vital defences against anarchy, crime and impoverishment. For FOI and openness in government to deliver any beneficial effect in relation to those public goods, it is necessary that they should enhance public trust, as the Campaign for FOI consistently argued they would. Yet there seems to be little evidence of any such development.

The work of Chapman (1987) on relationships between ministers and civil servants is relevant in this context. Writing in the 1980s he identified a number of inter-connected developments in the UK that were tending to undermine both the doctrine of ministerial responsibility – that ministers and not civil servants are answerable to Parliament – and the doctrine of the collective responsibility of the Cabinet. These developments include:

- Public enquiries and select committees questioning civil servants in public
- Ministers failing to support their civil servants when the latter come under criticism, even though constitutional conventions dictate that they cannot defend themselves
- Politicisation of the civil service, particularly through the introduction of special advisers nominated by ministers but paid by the tax payer
- The apparently widespread practice of officially condoned and highly selective leaking, i.e. of ministers foregoing the right to receive and consider policy advice and its implementation outside the public arena
- The development of management by objectives and targets that began with the Fulton report in the 1970s and which implies a form of accountability incompatible with ministerial responsibility
- Falling standards on the part of politicians and ultimately the public.

It could be argued that these and other subsequent developments (including the introduction of FOI legislation) have been instrumental in achieving the shift of accountability away from the top, i.e. ministers, and towards the middle ranks of the machinery of government – civil servants, police forces, National Health Service [NHS] boards and trusts, local authorities and so forth. Tony Blair especially has been accused of being excessively focussed on media management and of adopting a presidential style in his dealings both with the Cabinet and Parliament (Johnson 2005:297)⁵ (in which he had a large majority) to the detriment of proper procedure (Gough 2007). Apparently the latter criticism was even made by the Chancellor of the Exchequer (Blair 2010:311). Two highly regarded inquiries have produced reports that appear to confirm these criticisms in relation to disregard of due process – the Butler Report on Intelligence on Weapons of Mass Destruction (Butler of Brockwell 2004) and the Hutton Report on the death of Dr Kelly.⁶ Moss (2005) has demonstrated that the tendency to disregard proper procedures has had serious consequences for record keeping in the Cabinet Office, particularly during the years when Tony Blair held office as Prime Minister. Sir Richard Wilson too has expressed concerns in relation to public records and especially e-mails, saying “I have a real worry that fairly important decisions get taken in emails which are actually a fairly ephemeral medium. I have quite a worry about public records in that area” (Todd 2005:315).

Ethics and responsibility

The final bullet point derived from Chapman’s analysis is probably the most important. He writes “One cannot escape the conclusion that the standards of public conduct have declined and that they reflect a decline in the standards of society as a whole” (Chapman 1987: 63). Chapman (1897: 64) goes on to argue that “Institutional tinkering cannot be expected to resolve fundamental problems of moral standards and integrity in public affairs”. These remarks point towards one of the apparent defects in archival literature about accountability, namely that it often overlooks the defects of democracy. Foremost amongst these is that many of the electorate are uninterested, poorly informed and lack both relevant experience and judgement (Johnson 2005:302). A further factor is a tendency towards venality on the part of the electorate. This has an inherent impact in undermining concepts of public good and collective interest.⁷ As O’Neill (2002b) has formulated it, the “... underlying difficulty ... is that [such approaches] assume a passive view of human life and citizenship. They don’t answer the active citizen’s question ‘what should I do?’”.

Cox (2006) makes interesting observations on the benefits of faith in relation to accountability. Under the rubric “the need for spirituality in the information age” he refers to the Bible and particularly “the description of the Tower of Babel early in Genesis and the occasion of Pentecost in the second chapter in Acts” (Cox 2006: 13-15). Similar points have been made by Gondwe. Gondwe quotes the *Bible*, the books of Jeremiah and Esther in particular, and the Koran as providing warrant for good record keeping (National Archives of Malawi 2006). The authors of this article have no argument of principle against the positions taken in their different ways by Cox (2006) and Gondwe. In fact we are inclined to agree that moral standards are essential to the achievement of collective goods and would argue, in agreement with O’Neill (2002b) and Bovens (1998) that positive citizenship is called for too. We are aware, however, that sometimes people who sincerely embrace faith and uphold high ethical standards in private life adopt a very different attitude to government business. Interestingly, Murove (2003) in his ethical inquiry into the future of the African archival tradition does not address the ethical underpinnings required to make nation states or governments deliver public goods but focuses instead on communities. There are major challenges here both for record keeping professionals and for the most senior public servants (Tough 2011).

Appraisal theories

Richard J. Cox draws our attention to the fact that there are many theoretical appraisal models and how complex and daunting the task of appraisal is, encompassing as it may:

... preserving and protecting any aspect of the documentary heritage that is endangered; acquiring a systematic documentation of particular aspects of society; serving diverse constituencies with very different objectives; ... providing a cultural or public memory role; safeguarding records as both artifacts and information systems; sustaining identity, community, and collective memory of particular segments of society; ensuring the accountability of public officials, civic and corporate leaders; managing records of all media; and serving as a repository of last resort for records that have been stranded by their creators (Cox 2002).

However, the degree to which recent theoretical appraisal models affect practice is debatable.

Sir Hilary Jenkinson is commonly cited as the primary advocate of the classical British approach to appraisal, first articulated in the aftermath of the First World War. He believed that the role of the archivist was not to select records but to act as an unbiased custodian. Thus, if selection must occur, only those who use records in an administrative role have legitimate authority to undertake it. Writing in the 1920s he stated:

For the archivist to destroy a document because he thinks it useless is to import...an element of his personal judgment...but for an administrative body to destroy what it no longer needs is a matter entirely within its competence (Jenkinson cited in Shepherd & Yeo 2003:150).

In North America, Schellenberg (1956) attempted to broaden the institutional bias of Jenkinson by developing a system of record values that considered the needs of a much wider range of users. Appraisal became an important archival function, necessary due to the dramatic escalation of the production of records. He made a distinction between primary and secondary values (see Figure 1) stating that “public archives have two types of value: a primary value to the originating agency and a secondary value to other agencies and non-government users” (Schellenberg 1956:28)

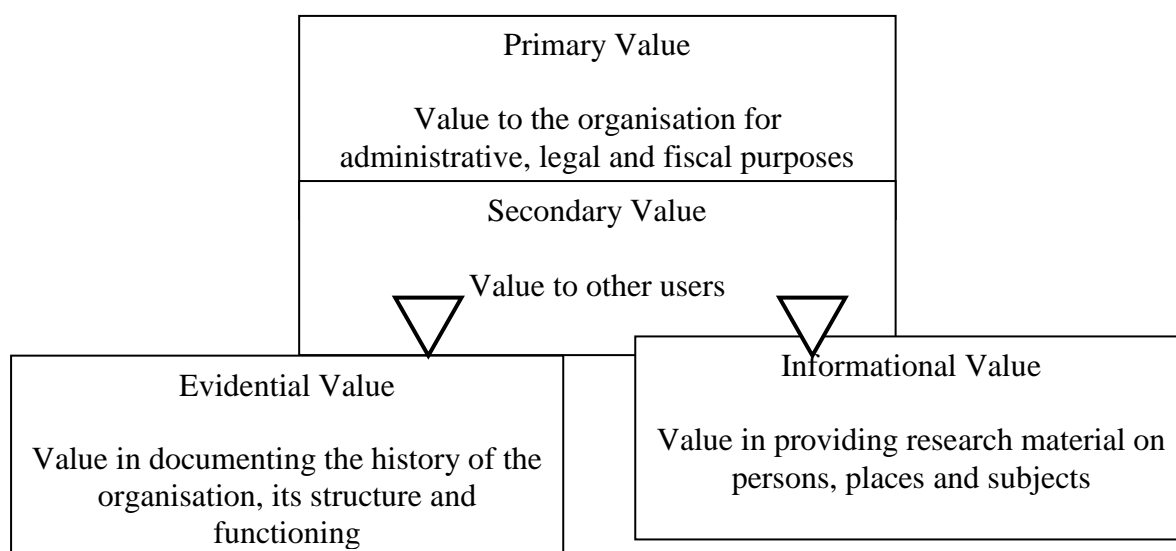


Figure 1: Schellenberg’s Appraisal Taxonomy (Shepherd & Yeo 2003:148)

Schellenberg’s (1956) discussion of evidential value has been criticized for its focus on factual content and its supposed failure to recognise the importance of authentic evidence to support

organisational accountability and business needs. The user-driven model removed records from their context. As a result appraisal criteria became external to the record. This ran the risk of undermining its provenance and in turn devaluing the role of archives in cultural memory. Furthermore Schellenberg saw informational and evidential values only as components of 'secondary' value, but "in practice both evidence and information can be sought by internal and external users alike" (Shepherd & Yeo 2003:151). In addition Schellenberg's (1956) dichotomy does not take into account the full diversity and complexity of institutional policies and responsibilities. This is highlighted by Boles and Young who argue that his priorities reflect the public archives tradition at the expense of the historical manuscripts tradition:

There are... repositories that serve as institutional archives whose primary goal is to document other organisations or subject areas. Retention of records of evidential value to the parent organisation is not the principal concern (Boles & Young 1985:123).

Another complexity is that of assigning informational value. It is argued that the emphasis on the value of records for historical research, left archives subject to the trends of historical research. In addition while trying to predict future research trends the user-orientated archivist was failing to document the wider society in which both the records creators and institutions functioned.

In the last quarter of a century, a number of highly theoretical models of appraisal have been put forward. Many of these have focussed on archives and largely ignored the need to manage current record keeping systems. One of the influential thinkers is Hans Booms, who asserted that "society must be able to define its own core values, and that these values should then be comprehensively mirrored through archival records" (Cook 1997). Booms initially advocated that archivists should research directly into social trends and public opinion with the aim of directly documenting society. Another theoretical approach based on societal thinking was developed by Samuels in the United States, with her concept of the documentation strategy. Samuels envisaged this as a "multi-institutional, cooperative analysis that combines many archives' appraisal activities in order to document the main themes, issues, activities or functions of society" (Cook 1997). In 1988 Cox and Samuels proposed a research agenda with the aim to strengthen archival appraisal and the profession's ability to document society (Cox & Samuels 1988:30).

By 1991 Booms had refined his thinking and was advocating that society's values were best identified indirectly through research into the functions of key records creators designated by society to realise its needs and wishes. As observed by Cook, Booms asserted that "archivists require a useful analysis of records-creating functions to help them connect the documentary needs.... with the records themselves" (Cook 1997).

Samuels (1992) also developed her earlier work, advocating the concept of the Institutional Functional Analysis. Here Samuels (1992) argues that archivists first need to research and understand functions and activities of their own institutions, and only then can the archivist engage in a wider, institutional documentation strategy. The key issue for Samuels is that "analysis and planning must precede collecting" (Samuels 1992:15). This emerging focus on functions opened up the possibility of re-connecting debates amongst archivists with the concerns of Records Managers, not least the need to create record keeping systems that will support probity.

Strategies that look first at functions and only later at records have emerged. Terry Cook describes it as a "shift from the analysis of the properties and characteristics of individual documents or series of records, to an analysis of the functions, processes and transactions which cause documents and series to be created" (Cook 2001). These developments in thinking have

found their practical realisation in the adoption of functional analysis as a basis for macro-appraisal. An example of this kind of approach is that of the macro-appraisal strategy adopted in 1991 at the National Archives of Canada. In the Canadian approach, the focus is on the larger or ‘macro’ context of the records, as revealed through their creators’ functions, programmes, activities, and transactions. Research focuses on records creators rather than directly on society, in the belief that those creators, and those citizens and organisations with whom they interact, indirectly represent the collective functioning of society.⁸ Other examples of projects based on functional analysis include the Dutch PIVOT project (Bikson & Frinking 1993:33-34), work carried out at Glasgow University Archive Services on the practical application of functional appraisal for business records (Hosker & Richmond 2006) and the adoption of functional appraisal at the National Archives of Australia.⁹

While macro-appraisal can be related directly to appraisal theory on documenting society, combined approaches have been developed that incorporate more pragmatic considerations. For example, Boles and Young (1985) undertook a survey of archival institutions with the aim of getting a better understanding of the methodology underlying selection. As a result of this research they developed a model known as the Black Box. The model consists of three interrelated categories of elements: value-of-information, cost-of-retention, and implications-of-the-appraisal-recommendations, each of which should be considered when making an appraisal decision. These three categories are broken down further into several levels of characteristics. The model utilises cost-benefit analysis and borrows elements of functional analysis, content analysis, user interest (including research trends), as well as practical elements (for example, storage and conservation) and political considerations. Ham (1993) suggests five key aspects that should be considered when making an appraisal decision. It is evident that the approach advocated by Ham, summarised in Table 1, is similar to the Black Box model presented by Boles and Young (1985).

Table 1: Gerald Ham key aspects of appraisal (University of Aberystwyth 2005:31)

KEY ASPECT	INTERPRETATION OF ASPECTS
Functional Analysis	Importance of the original purpose of the records, including significance of records creator, creator’s functions and the records themselves.
Content Analysis	Informational significance of records, (for example subjects represented in records and quality of documentation).
Context Analysis	The significance of records in relation to other documentation, including consideration of duplication, uniqueness, format, scarcity and record linkage.
Use Analysis	Value of records in meeting information needs and interests of the repository’s clientele for past or projected uses, including the accessibility of the records and / or information.
Cost-benefit Analysis	Weighing the value of information in the records against the cost of preservation, including facilities and staff time required for accessioning, processing, conservation and long-term storage.

The approaches to appraisal described and discussed above stemmed from increasing criticism of the older “traditional” appraisal models, particularly those developed by Jenkinson and Schellenberg. However, the new strategic approaches that have been developed in recent years are not free from criticism. The societal models, functional analysis, macro-appraisal and the Black Box model all involve the “implementation of structured, planned strategies – requiring in many cases extensive research and analysis of the documentary universe” (University of Aberystwyth 2005:31). An article by Ericson about a two-year project, in the Milwaukee metropolitan area in the USA, discusses problems that arose whilst testing the documentation

strategy framework. The project involved archivists, records managers, museum curators and librarians along with record creators and record users. Ericson argues that the project did not fulfil any of its original goals, and that it was vague, inaccurate and incomplete (Ericson 1997). Even more importantly, many recent writers ignore that fact that most records professionals owe a primary duty to their employing institution. The idea that they have a broad culturally oriented social mission may well collide with this simple reality.

Strategic approaches based on functional analysis also need to be approached with caution. Critics of macro-appraisal argue that there is no provision for archivists to look at records at all: decisions are taken purely by defining and assessing the context of record-creating activities. Roberts (2001) questions the portability of macro-appraisal offering a universal solution to issues of appraisal, arguing that a solution that works in one context may be entirely impractical in a different environment.

Due to the complex and resource intensive nature of societal models and strategic approaches based on functional analysis, small and under-resourced archives may have to use simpler practical tools and approaches. Possible approaches include sampling and re-appraisal / de-accessioning. Sampling is a technique used to reduce bulk in cases when it is not feasible to retain entire records sets or series (Maxwell-Stewart & Tough 1999). Michael Cook refers to four sampling methods which include keeping typical examples, purposive sampling, systematic sampling and random sampling (Cook 1999:89-91). Re-appraisal / de-accessioning involves reviewing existing holdings, many of which may have been accessioned before the repository had clear policies on acquisition in place, in light of the repository's collection policy and appraisal strategy.

The shift to information technology (IT)

The computerisation of office work, especially the introduction of networked PCs functioning in a Windows environment, has had radical consequences for record keeping professionals. This is particularly true in Commonwealth countries where pre-action workflow (registry) systems have tended to be undermined by Microsoft's assumption that everyone uses American-style post-action filing. The dynamic nature of IT systems and the serious preservation challenges that arise in relation to relatively recently created e-records mean that it is no longer satisfactory either to take the existence of systems for granted or to wait passively for non-current records to be offered to an archives or records management department. Effective electronic records management systems need to be pro-active in ways that their predecessors in a paper and card environment did not need to be. The challenges of undertaking electronic records management have been rendered more complex by the emergence of cloud computing (Bailey 2008). Although the utilisation of Web 2.0 applications is rarely provided for in civil service regulations in African countries, many civil servants resort to the Cloud to carry out their business. This may be to their credit as it shows initiative and a desire to get work done, often in difficult circumstances. Unfortunately, it is often done without any risk assessment, thereby jeopardising confidential data (Tough 2011).

It is natural that most of the published Records Management literature concentrates on engagement with systems design as an objective of record keeping professionals. In a lucid exposition of this approach Shepherd and Yeo (2003:154) state that, "If records are classified on functional principles ... each process corresponds to a distinct record series. Appraisal at system design stage is likely to focus on processes and the series arising from them". They also point to an 'ideal world' scenario where "... if retention decisions are linked to series level entries in classification schemes, each file or folder can be assigned its retention status at the same time as

it is created, classified and allocated to a series. Electronic records management (ERM) applications and automated systems for managing paper records may allow metadata defining the retention status of newly opened files or folders to be automatically inherited from metadata entered previously at series level” (Shepherd & Yeo 2003:165). However, Shepherd and Yeo (2003) do not provide any ‘real world’ examples of the approach they advocate being implemented successfully. Smith (2007), in writing about the appraisal of electronic records implicitly refers to the experience of The National Archives of the United Kingdom (TNA). Smith’s (2007) book is probably the best evidence we have that functionally based appraisal methodologies can be made to work in reality. There are plenty of articles by members of staff in companies that sell ERM or EDRMS software that proclaim the successes of their employer’s products but these can hardly be regarded as impartial evidence. Whilst the best way forward may appear to have been identified, for many record keeping professionals daily reality is much more challenging.

One challenging scenario takes the messy form of shared drives that have been badly implemented. It should be acknowledged that this can be patchy, with oases of good record keeping co-existing with awful muddles. Nonetheless in many organizations the introduction of shared drives has been a disaster. Where colleagues previously shared information quite effectively via communal filing cabinets, the introduction of Local Area Networks and shared drives has resulted often in excessively personalized record keeping systems. Frequently, folders in shared drives have not been used as a means of sharing but have become personal to a single user. This has been a very widespread pattern in the National Health Service (NHS) in the UK. However, alternatives are available. Where a consistent file plan, derived from a functional Business Classification Scheme, is used shared drives will support team working, cooperation and information sharing. Equally important, shared drives used in this way have the potential to support version control, the capture of metadata and the creation of records possessing evidential value (by which we mean records that will be accepted by auditors, law courts and others as being accurate and genuine). The Common Services Agency in the NHS in Scotland is implementing this approach currently. In addition, Library and Archives Canada have been undertaking valuable but as yet unpublished work on the shared drives challenge on behalf of the public service in their country.¹⁰

So far as records appraisal is concerned, badly implemented shared drives constitute a major problem. Item by item appraisal is clearly impractical. In reality, so is folder by folder appraisal because in this situation even the people who created the records can no longer explain how they ‘organised’ things. Ample evidence of this is provided by the plethora of forenames and long-forgotten acronyms that have been used both to name documents and folders. An alternative is to adopt a functional approach and to keep whole shared drive systems where they relate to core functions judged to be of real importance. The drawback with this approach is that it may result in the preservation of great quantities of records which possess very questionable value for cultural purposes such as historical research and hardly any value for legal and other evidentiary purposes.

Natalie Ceeney, Keeper of the Public Records in the UK, has suggested that technological and other changes are having a profound and permanent impact on methods of working in the public service. She argues that the use of mobile telephones, other portable devices that support e-mail and a proliferation of informal meetings are effectively undermining long established ways of conducting business (Ceeney 2008). The findings of the Butler enquiry might be interpreted as supporting this view (Butler of Brockwell 2004). However, it may be too early to reach firm conclusions on this matter. In opposition the Conservative Party indicated a determination to reverse the trends that Ceeney and Butler have described. Ken Clarke’s ‘End of sofa

government' Working Party took evidence widely and produced a range of recommendations for the restoration of the collective responsibility of the cabinet, of an 'arms length' relationship between ministers and civil service and much more formal record keeping systems (Gough 2007). Since coming to office Britain's Conservative-Liberal Democrat coalition has created the Office of Budgetary Responsibility which is clearly intended to sustain the distinction between political judgement and impartial analysis. The recommendations of the Chilcott Enquiry are expected to drive a further restoration of constitutional propriety.

Risk management

The discipline of risk management has emerged during the last half century, at least partly in response to corporate executives' concerns about IT systems. In the private sector, risk management has become steadily more influential at the highest levels of management. For a time high levels of risk taking became fashionable, especially in the financial sector. As a result the principle that outward-facing and internal operations should be separated was abandoned by many organisations in the name of efficiency. This in turn tended to undermine long-established record keeping systems and practices. This pattern even spread to Malaysia, a country usually associated with conformity to rules and proper procedures (Yusof 2009). Notwithstanding the early indicators, such as the collapse of Barings Bank and the Enron scandal, that this would lead to serious trouble many financial institutions continued to follow high risk strategies until the global financial crisis that began in September 2008. Those financial institutions that took a different strategy and adopted a more conservative approach to risk taking have tended to cope better with the turbulence of 2008/09. Examples include Barclays Bank, Standard Life and the European Investment Bank. Interestingly, these three organisations have all devoted significant time and effort to up-grading records management systems. The work of Mat-Isa (2006) and Emmerson (2008) suggests that the attitude of non-executive directors has been a significant factor.

It should be emphasised that risk taking is not always negative. Some risks are worth taking consciously, especially in the commercial sector. The primary aim of risk management, nonetheless, is usually to identify threats and minimise both the likelihood of them occurring and the impact if they should occur (Currall 2006). Characteristically, the identification of risks will lead to an enhanced awareness of the need to establish good procedures, to train staff in their use and to monitor compliance with them. This can be of particular benefit in records management.

Vital records are a necessary component of thinking about risk. These are the records without which the organisation would cease to function or, at the least, would suffer seriously impaired effectiveness. Clearly, vital records should be safeguarded with particular care. Where they exist in paper formats, this will involve using locked safes, having procedures to control access and keeping security copies. Where vital records exist in electronic formats procedures to control access and prevent unauthorised alterations will be of even greater importance. The creation of electronic back-up copies will have to be monitored with particular care.

By including vital records within the scope of risk analysis, records managers can re-focus their thinking about records appraisal and disposal. The interests of tertiary users, commonly conceptualised as historians and others with a cultural mission, have tended to dominate the published literature in recent years. Alongside these societal models of appraisal, records managers have tended to concentrate on the criteria by means of which time-expired records may be most economically and efficiently disposed of. Introducing vital records into the matrix tends to bring current business needs and current record keeping systems to the forefront of

thinking. This is both intrinsically desirable and probably inevitable in the aftermath of the global financial crisis.

The identification of risks may seem to indicate conflicts between (a) the desirability of the most rapid destruction of records that is compatible with discharging the organisation's duties and responsibilities and (b) the need to retain vital records. In practice, a detailed examination of record types often will reveal a number that can be destroyed very quickly without harming the vital records in any way.

In addition, there can be conflicts between different risk factors. For example, the routine records generated by financial management activities – including receipted invoices, expense account claims and overtime claim sheets – tend to occupy a great deal of storage space. So there is a risk of wasting resources on the storage of unproductive records. However, there is a conflicting risk. This is that good governance may be undermined if records are destroyed before proper audit has been carried out. This conflict around issues of good governance has a particular relevance in many African countries.

Central African and wider African experience

The now-defunct Central African Archives (CAA) had a major impact on the development of Records Management practices in Botswana, Malawi, Zambia, Zimbabwe and even Kenya. The CAA existed as an inter-territorial service responsible for public sector archives and Records Management services in Southern Rhodesia, Northern Rhodesia, Nyasaland and Bechuanaland in the 1940s and early 1950s. Eventually it became a federal service, under the short-lived Federation of Rhodesia and Nyasaland. The CAA's systems were influential elsewhere, including Kenya. In the mid-1950s two CAA members of staff visited the USA. There they observed best practice in the US federal government and elsewhere. The CAA adopted a division of responsibility favoured by the US National Archives and Records Administration (NARA) with Treasury Organisation and Methods experts being responsible for the design and implementation of current record keeping systems whilst the maintenance, use and disposal of non-current records became the responsibility of the archives. So the CAA's focus was on retention and disposal scheduling and records centres (Baxter 1963). They developed highly effective and efficient systems, with rapid file retrieval and delivery times. In 1962 the CAA's records centres delivered annual savings on office space and equipment worth £250,000 whilst the total CAA budget was just £46,000. Their system depended on the design principles that (1) records remained the property of the creating department and (2) storage boxes were used as both physical and intellectual units.

The system depended on two key forms – the records transmittal list and the box label. Records transmittal lists were to be created by the transferring department, annotated in the Records Centre with CAA reference numbers and an annotated copy was sent back to the depositor. Box labels were produced in triplicate with one stuck on the box, one filed by box number and one filed by the action date (for destruction or transfer to archives) (Moore 1988). This system is still in use and it is very simple and effective. However, it removes any possibility of using information as a shared resource across the public sector. It depends crucially on pro-active staff to push forward destruction of rubbish, which in turn depends on existing schedules being renewed and new schedules being prepared and agreed. A major drawback of the CAA system is that ministry staff can easily withhold records that ought to be transmitted for the archives and send only records they regard as low-grade stuff (Mutiti 1988). The CAA system is recognisably based on the principles enunciated by Schellenberg. Between 1978 and 1981 many of the retention and disposal schedules used by the Government of Malawi were updated (National

Archives of Malawi 1978; 1981). However, the basic design principles of the system have remained unchanged for over half a century.

The 1990s have been described by Nathan Mnjama as a decade of transformation for national archives and records services in Africa (Mnjama 2003). He cites Botswana, The Gambia, Ghana and Tanzania as outstanding instances. There are other countries that could be added to this list, for example, Uganda. In each of these countries broken-backed registry systems were rehabilitated. Classification schemes reflecting current functions, rather than those of the 1950s and 1960s, were used as a basis for creating new filing systems in core ministries. Records centres were established or re-furnished, legislation was overhauled, procedure manuals written, teaching materials produced and trainers taught to use them. The International Records Management Trust under the leadership of Dr Anne Thurston played a significant role in these developments (IRMT [Sa]). As Peter Mazikana has pointed out, a failure to effectively address the challenge of electronic record keeping was a major weakness in some of these improvement programmes (Mazikana 2007). This weakness is reflected in the fact that many countries have implemented massive payroll management and establishment control projects since the 1990s with scant reference to record keeping professionals (IRMT 2008).

The progress in record keeping during the 1990s can best be understood in the context of the Structural Adjustment Programmes (SAPs) agreed between the IMF and a large number of near-bankrupt African states in the 1980s. A transition to a market economy, a severe retrenchment in the public service and the re-orientation of the public service to serving the public were three common themes of SAPs. Some leaders subverted SAP agreements that they had signed but never intended to honour. In Kenya, for example, parastatal industries were sold off to friends of the President and the ruling elite at low prices. However, there were countries that embraced reform wholeheartedly included Ghana under Jerry Rawlings and Tanzania under Ali Hassan Mwinyi (Meredith 2006: 371). It should come as no surprise that Ghana and Tanzania feature prominently in Mnjama's (2003) list of outstanding instances of improvement in record keeping systems. Where (at least in principle) probity in the handling of public money was being re-established it made sense to improve record keeping in support of accountability. Whilst Public Sector Reform Programmes re-invigorated archives and records services elsewhere in Africa during the 1990s, they made little impact in Malawi until the early twenty first century when the Rule of Law Programme was initiated by the former President Bingu wa Mutharika with financial support from the European Union.

The implications of functional analysis for practice

It should be evident that records retention and disposal schedules can be evaluated by identifying the functions discharged by specific public bodies and working out how effectively the current schedules cover the functions identified. It is common for public bodies to explicitly acknowledge their core functions in public. Websites are an obvious source of this information. They can be supplemented and given added depth by consulting reports laid before Parliament, reports of the Auditor General, reports of Anti-Corruption bodies and media reports. Frequently, the records manager would be well-advised to think laterally about the societal significance and impact of the discharge of those functions. Two examples may help to clarify these points.

Firstly, we have a functional analysis of the Ministry of Foreign Affairs in Malawi and an evaluation of retention and disposal schedules based on this. The text below presents an analysis of the functions performed by the Ministry of Foreign Affairs, distinguishing between core and support functions (Ministry of Foreign Affairs 2009). This analysis was carried out in 2009.

After each numbered function, information is provided in brackets about the extent to which existing records retention schedules apply to that function. Where no information in brackets is supplied, none of the available retention schedules applies. There are three retention schedules which can be applied to these records. They are:

- M4 = ‘Ministry of External Affairs Standing Instructions for the Disposal of Records’ [1960s?];
- M15 = ‘Common Disposal Schedule of records in government ministries, departments and offices’ [1960s?];
- Records series = ‘Records series common to government departments’ [1980s?].

Core functions

1. Mobilising external resources in the form of capital and technical assistance from bilateral and multilateral donors [M15 covers some aspects under ‘Development’; Records series covers some aspects under ‘Aid’ and other aspects under ‘Projects’]
2. Attracting foreign direct investment
3. Promoting trade, including securing markets for Malawian products
4. Promoting tourism
5. Promoting a positive image of Malawi abroad
6. Delivering protocol services, including accreditation of diplomats and ceremonial functions [M15 covers ceremonial functions; Records series covers celebrations]
7. Analysing political, social and cultural developments abroad in order to advise the Malawi Government on their implications [Records series covers some aspects under ‘Policies’]
8. Facilitating the maintenance of peace and international cooperation, particularly through regional organisations [M4 refers to international organisations and agreements]

Support functions

1. Human Resource management [M4 covers Establishment; M15 covers personnel and training; Records series covers Human Resources]
2. Office services [M4 covers communications; M15 covers office administration; Records series covers administration]
3. Information management [M15 covers publications and publicity]
4. Financial management [M4 refers to Accounts; M15 covers accounting and stores records; Records series covers finance]
5. Internal audit [M15 states all reports to be preserved; Records series states audit reports to be discarded after 5 years]

It is apparent immediately that a number of core functions are not catered for by the existing retention schedules. These include attracting foreign direct investment and promoting trade, tourism and a positive image of Malawi abroad. Other core functions are not adequately catered for, for example accreditation of foreign diplomats. The support functions, in contrast, are all covered by at least one retention schedule. This reflects a common criticism of records managers – they we deal more effectively with routine administration than with substantive business functions.

There is a significant problem in respect of support functions, namely a lack of consistency between the available retention schedules. Radically different advice in respect of audit reports has been noted above. A similar situation exists in relation to accounting records. The M4 schedule states that records relating to “Settlement of bills on behalf of statutory bodies by Malawi missions abroad” should be preserved permanently whilst the M15 schedule specifies a 7 years retention period for records of “Specialised funds and schemes” and the Records series schedule specifies a 2 years retention period for the same class. Similarly, the M4 schedule states

that “senior staff curriculum vitae” should be preserved permanently whilst the M15 schedule and the Records series schedule both specify a 50 years retention period for personal files of long-serving officers.

It may be concluded that a functional analysis demonstrates that existing records retention schedules provide neither comprehensive coverage nor consistent guidance on action in relation to the Ministry of Foreign Affairs. To this may be added the thought that the lack of guidance in respect of some allegedly core functions reflects the reality that these are phantom functions. In other words, the Ministry aspires to undertake some functions such as promoting tourism whilst, in reality, this function is discharged in part by the private sector and in part by the Ministry of Tourism, Wildlife and Culture.

A second example may help to illustrate another point made above, namely that in addition to addressing the functions explicitly acknowledged by public bodies it may be necessary to think laterally about the societal significance and impact of the discharge of those functions. In South Africa under Apartheid the functions of the criminal justice system were defined officially in much the same way as anywhere else in the world: the protection of life and property; the maintenance of public order; the detection and punishment of organised crime; and so on. Behind such bland statements lay, amongst other things, the reality of enforcing the pass laws and thereby controlling the majority black population of South Africa. This function produced a vast series of case files concerning the prosecution of those who broke the pass laws. An appraisal of these records based on a functional analysis and informed by societal concerns might to have led to the retention of either a representative sample or of the records in their entirety. The choice between these options might have depended upon whether the ultimate objective was to serve historians and other tertiary users (in which case a sample would suffice) or to serve restorative justice (for which the retention of the whole series would have been necessary). In reality, all of these records were destroyed.¹¹

The implications of risk management and vital records analysis for practice

In this section risks and vital records are discussed, also in relation to the functions of the Ministry of Foreign Affairs in Malawi. These functions were identified in the previous section. The functions are presented in the same order as before. Where a significant risk has been identified this appears in square brackets immediately after the function referred to. Similarly, where vital records have been identified these appear in square brackets.

Core functions

- Mobilising external resources in the form of capital and technical assistance from bilateral and multilateral donors [vital records: current agreements and treaties; key project implementation documentation];
- Attracting foreign direct investment [risk: litigation by aggrieved investors] [vital records: files re current investors and their investment projects, with related financial records];
- Promoting trade, including securing markets for Malawian products [risk: litigation by aggrieved traders] [vital records: files re current negotiations and concluded negotiations re securing markets];
- Promoting tourism;
- Promoting a positive image of Malawi abroad;
- Delivering protocol services, including accreditation of diplomats and ceremonial functions [Vital records: list of diplomatic corps in Malawi, with contact information];

- Analysing political, social and cultural developments abroad in order to advise the Malawi Government on their implications [risk: breaches of confidentiality leading to deterioration in relationships with foreign governments if reports become public]; and
- Facilitating the maintenance of peace and international cooperation, particularly through regional organisations such as SADC [risks: failure to adapt to changing realities in global politics in the absence of good intelligence; breaches of confidentiality jeopardising delicate negotiations] [vital records: current agreements and treaties; records of boundary commissions; formal decision-making records of regional organisations (especially where Malawi provides the secretariat)].

Support functions

- Human Resource management [risks: data protection breaches causing reputational damage to individuals; litigation by aggrieved employees and job applicants];
- Office services [risk: waste of resources on storage] [Vital records: list of Malawian diplomats abroad, with contact information; payroll for Ministry];
- Information management [risk: breaches of confidentiality due to poor information security/records management];
- Financial management [risks: failure to uphold governance standards due to failure to create and organise records and/or inability to retrieve records and/or premature destruction of records; waste of resources on storage];
- Internal audit [risk: failure to uphold governance standards due to failure to create and organise records and/or inability to retrieve records and/or premature destruction of records].

It is immediately apparent that core functions give rise to most of the vital records (i.e. records without which the Ministry would cease to function effectively). However, not all core functions generate vital records. Promoting tourism and a positive image abroad are largely a matter of advertising and producing promotional materials: these are not vital records. The complete list of vital records is as follows:

current agreements and treaties; key project implementation documentation; files re current investors and their investment projects; files re current negotiations and concluded negotiations re securing markets for Malawian products; list of diplomatic corps in Malawi, with contact information; records of boundary commissions; formal decision-making records of regional organisations (especially where Malawi provides the secretariat); list of Malawian diplomats abroad, with contact information; and the payroll for the Ministry. All of these will form part of the current record keeping systems of the Ministry, except for records of boundary commissions which are likely to be found in the National Archives.

Some of the risks identified above indicate a possible conflict between (a) the desirability of the most rapid destruction of records that is compatible with discharging the Ministry's duties and responsibilities and (b) the need to retain vital records. This is particularly the case in relation to Human Resource records. Relatively rapid destruction of HR records may support data protection, frustrate vexatious litigants and reduce storage costs. On the other hand, the payroll and details of Malawian diplomats abroad need to be safeguarded as vital records. This conflict may be more apparent than real. A detailed examination of record series should reveal a number (for example, annual leave applications and job applications received from unsuccessful applicants) that can be destroyed very quickly without harming the vital records in any way.

In addition, there can be conflicts between different risk factors. For example, the routine records generated by financial management activities – including receipted invoices, expense account claims and overtime claim sheets – tend to occupy a great deal of storage space. So there is a risk of wasting resources on the storage of unproductive records. However, there is a conflicting risk. This is that good governance may be undermined if records are destroyed before there has been an opportunity for malpractice to be uncovered.

Concluding remarks

Paradoxically, the least regarded records may have a real utility for accountability purposes. That routine financial records have the potential to reveal malpractice is evident in the UK in the aftermath of the MP's expenses scandal (Tough 2011). In Malawi similarly routine records, many of them placed in National Archives records centres, provided the basis of providing justice to the victims of Dr Banda's regime. They might even provide a means of combating the culture of impunity. This, however, is a line of thinking that challenges those retention and disposal schedules that provide for all routine records to be destroyed after the passage of a relatively short period of time. We may need to re-think these assumptions and practices.

The identification of risks can lead to an enhanced awareness of the need to establish good procedures, to train staff in their use and to monitor compliance with them. The risk of breaches of confidentiality due to poor information security/records management falls into this category. The Foreign and Commonwealth Office in the Britain has adopted a strict policy on security in a digital environment, including a prohibition on the use of removable electronic storage devices, for exactly this reason. The failure of their counterparts in the United States of America to create and maintain effective data security and records management has caused huge damage through the continuing flood of Wikileaks disclosures (Domscheit-Berg 2011). It is this kind of high-profile event that is likely to create the political will that is necessary to ensure that the potential of record keeping systems to support good governance is realised. Up-graded appraisal procedures and policies have a significant part to play in that realisation.

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Endnotes

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2. The authors are grateful to Prof Ketelaar for providing a copy of his research notes on this topic.
3. Moss also points out that concepts of accountability and responsibility that operate in the public sector may not translate to the private sector, arguing "The foundation of modern enterprise is limited liability".
4. *Our right to know*, Campaign for Freedom of Information, 1984 "... this campaign will not seek the disclosure of information that would: ... (g) breach the confidentiality of advice,

- opinion or recommendation tendered for the purpose of policy-making.” Cited in Nairne (1987:40).
5. A 2002 Green Paper ‘In the service of democracy’ included proposals for making MPs more accountable to their constituents but none about making ministers more accountable to Parliament.
 6. Report of the Inquiry into the circumstances surrounding the death of Dr David Kelly, CMG, HC 247, 2004.
 7. Any parliamentary candidate who has undertaken door to door canvassing can testify to the prevalence of the ‘what will you do for me’ mentality.
 8. For information about macro-appraisal as a methodology in Canada see, The National Archives of Canada. *Government Records Disposition Policy: Appraisal Methodology: Macro-Appraisal and Functional Analysis Part A: Concepts and Theory Part B: Guidelines for Performing an Archival Appraisal on Government Records*. [Online]. Available WWW: <http://www.collectionscanada.ca/information-management/007/007007-1034-e.html>. (Accessed 16 May 2006).
 9. See the National Archives of Australia website for further details of their approach to appraisal. Australia. The National Archives of Australia. *Recordkeeping*. [Online]. Available WWW: <http://www.naa.gov.au/recordkeeping/disposal/appraisal/macro-appraisal.html> (Accessed 16 May 2006).
 10. The authors would like to thank Greg Bak and Library and Archives Canada for sharing unpublished guidance.
 11. This episode was reported in South African Sunday newspapers on 5 September 1993.