

# ATLANTI

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*International review for modern archival theory and practice*  
*Rivista internazionale di teoria e pratica archivistica moderna*  
*Mednarodna revija za sodobno arhivsko teorijo in prakso*

Volume 31(2021)

Number 2



Trieste - Maribor 2021

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Archives and Challenge of Disposal Procedure  
Archivi e sfide della procedura di smaltimento  
Arhivi in izzivi škartiranja



**International Institute for Archival Science  
of Trieste and Maribor  
State Archives of Trieste**

Trieste - Maribor 2021

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**International Institute for Archival Science of Trieste (Italy) and Maribor (Slovenia)**  
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## KAZALO

Pekka Henttonen DEVELOPMENT OF FINNISH ARCHIVAL APPRAISAL _____ SVILUPPO DELLA VALUTAZIONE D'ARCHIVIO FINLANDESE RAZVOJ FINSKEGA ARHIVSKEGA VREDNOTENJA	7
Bogdan-Florin Popovici SOME CONSIDERATIONS ON ARCHIVAL FOR PERMANENT RECORDS IN ROMANIA _____ ALCUNE CONSIDERAZIONI SULLA VALUTAZIONE D'ARCHIVIO PER I DOCUMENTI PERMANENTI IN ROMANIA NEKAJ RAZMISLEKOV O VREDNOTENJU TRAJNIH DOKUMENTOV V ROMUNIJ	19
Elisabeth Schögggl-Ernst APPRAISAL OF DIGITAL INFORMATION – SOME CONSIDERATIONS _____ LA VALUTAZIONE DELL'INFORMAZIONE DIGITALE – ALCUNE CONSIDERAZIONI VREDNOTENJE DIGITALNIH INFORMACIJ – NEKAJ PREMISLEKOV	33
Andrei Rybakou APPRAISAL OF ELECTRONIC DOCUMENTS: CRITERIA AND STAGES _____ VALUTAZIONE DEI DOCUMENTI ELETTRONICI: CRITERI E FASI VREDNOTENJE ELEKTRONSKEGA GRADIVA: KRITERIJI IN STOPNJE ЭКСПЕРТЫЗА КАШТОЎНАСЦІ ЭЛЕКТРОННЫХ ДАКУМЕНТАЎ: КРЫТЭРЫІ І ЭТАПЫ	43
Stefano Allegrezza "WE ARE WHAT WE CHOOSE TO KEEP": REFLECTIONS ON APPRAISAL PRACTICES IN PERSONAL ARCHIVES _____ SIAMO QUELLO CHE SCEGLIAMO DI MANTENERE": RIFLESSIONI SULLE PRATICHE DI VALUTAZIONE NEGLI ARCHIVI PERSONALI "SMO TO KAR ŽELIMO OBDRŽATI": REFLEKSIJE O PRAKSAH VREDNOTENJA V OSEBNIH ARHIVIH	56
Dimitri Brunetti FILE THINNING IN ARCHIVE IN THE CONTEXT OF THE DIGITAL TRANSFORMATION OF THE ITALIAN PUBLIC ADMINISTRATION _____ LO SFOLTIMENTO IN ARCHIVIO NEL CONTESTO DELLA TRASFORMAZIONE DIGITALE DELLA PUBBLICA AMMINISTRAZIONE ITALIANA ZMANJŠEVANJE DATOTEK V ARHIVU V KONTEKSTU DIGITALNE TRANSFORMACIJE ITALIJANSKE JAVNE UPRAVE	66
Liudmila Varlamova NEW APPROACH TO SYSTEMATIZATION OF DOCUMENTS 75 FOR DETERMINING THEIR RETENTION PERIOD _____ NUOVO APPROCCIO ALLA SISTEMATIZZAZIONE DEI DOCUMENTI PER DETERMINARE IL LORO PERIODO DI CONSERVAZIONE NOV PRISTOP K SISTEMATIZACIJI DOKUMENTOV ZA DOLOČANJE ROKA HRANE	75
Sarvesh Singh ARCHIVES AND THE CHALLENGES OF APPRAISAL PRACTICES _____ GLI ARCHIVI E LE SFIDE DELLE PRATICHE DI VALUTAZIONE ARHIVI IN IZZIVI VREDNOTENJA	87
Maria Papanikolaou TOWARDS AN APPRAISAL AND SELECTION FRAMEWORK FOR THE DIGITAL RECORDS OF THE AMERICAN UNIVERSITY IN CAIRO (AUC) _____ VERSO UN QUADRO DI VALUTAZIONE E SELEZIONE PER I DOCUMENTI DIGITALI DELL'UNIVERSITÀ AMERICANA DEL CAIRO (AUC) VREDNOTENJE IN IZBIRNI OKVIR ZA DIGITALNE ZAPISE AMERIŠKE UNIVERZE V KAIRU (AUC)	94

Jelka Melik, Aida Škoro Babić DETERMINATION OF RECORDS FOR PERMANENT PRESERVATION IN LEGAL ACTS OF EU AND EU MEMBER STATES _____	103
DETERMINAZIONE DEI DOCUMENTI PER LA CONSERVAZIONE PERMANENTE NEGLI ATTI GIURIDICI DELL'UE E DEGLI STATI MEMBRI DELL'UNIONE EUROPEA DOLOČITEV DOKUMENTOV ZA TRAJNO HRAMBO V PRAVNIH AKTIH EU IN DRŽAV ČLANIC	
Nina Sotelšek THE ROLE OF PARTICIPATORY PRACTICES IN HERITAGE INSTITUTIONS _____	115
IL RUOLO DELLE PRATICHE PARTECIPATIVE NELLE ISTITUZIONI DEL PATRIMONIO VLOGA PARTICIPATIVNIH PRAKS V DEDIŠČINSKIH USTANOVAH	
Anja Prša PROCESS OF APPRAISAL FOR BUSINESS RECORDS _____	126
PROCESSO DI VALUTAZIONE PER I DOCUMENTI AZIENDALI PROCES VREDNOTENJA POSLOVNE DOKUMENTACIJE	
Gianni Penzo Doria DATA DISPOSAL, RECORDS APPRAISAL _____	139
SCARTO DI DATI, SELEZIONE DI DOCUMENTI RAZPOLAGANJE S PODATKI, VREDNOTENJE GRADIVA	
Aliya Mustafina THE PROBLEM OF APPRAISAL OF DIGITAL RECORDS _____	152
IL PROBLEMA DELLA VALUTAZIONE DEI DOCUMENTI DIGITALI PROBLEMATIKA VREDNOTENJA DIGITALNIH ZAPISOV	
ATLANTI Guidelines for authors _____	161



Pekka Henttonen

## DEVELOPMENT OF FINNISH ARCHIVAL APPRAISAL

### Abstract

*Finnish appraisal has been characterized as proactive, democratic, and "semi-jenkinsonian". The idea of proactive appraisal was adopted from Sweden in the 1930's. The goal is to make decisions about retention at an early phase in records' life span. Appraisal is "democratic" in the sense that it has strived to leave a complete picture of the Finnish society in the archives. This has been reflected in sampling methods that have lost their popularity with the advance of digitalization. Appraisal is semi-jenkinsonian in the sense that decisions about permanent retention are made in co-operation with the agencies in the national and municipal administration. Since the 1980's, records management plans have been a vital part of the appraisal processes. Current challenges of appraisal include the need to appraise ambient functions (like healthcare, or social welfare) instead of records of individual agencies, among others.*

**Keywords:** appraisal, sampling, disposal, archival history, Finland

## SVILUPPO DELLA VALUTAZIONE D'ARCHIVIO FINLANDESE

### Sintesi

*La valutazione finlandese è stata caratterizzata come proattiva, democratica e "semi-jenkinsoniana". L'idea di una valutazione proattiva è stata adottata dalla Svezia negli anni '30. L'obiettivo è prendere decisioni sulla conservazione in una fase iniziale della vita dei record. La valutazione è "democratica", nel senso che ha cercato di lasciare negli archivi un quadro completo della società finlandese. Ciò si è riflesso nei metodi di campionamento che hanno perso popolarità con l'avanzare della digitalizzazione. La valutazione è semi-jenkinsoniana, nel senso che le decisioni sulla conservazione permanente vengono prese in collaborazione con le agenzie dell'amministrazione statale e municipale. Dagli anni '80 i piani di gestione delle registrazioni sono stati una parte vitale dei processi di valutazione. Le attuali sfide della valutazione includono, tra le altre cose, la necessità di valutare le funzioni ambientali (come l'assistenza sanitaria o il benessere sociale) anziché i registri delle singole agenzie.*

**Parole chiave:** valutazione, campionamento, smaltimento, storia d'archivio, Finlandia



## RAZVOJ FINSKEGA ARHIVSKEGA VREDNOTENJA

### **Povzetek**

*Finsko vrednotenje je bilo označeno kot proaktivno, demokratično in »pol-jenkinsonsko«. Ideja o proaktivnem vrednotenju je bila prevzeta po švedskem modelu v tridesetih letih prejšnjega stoletja. Cilj je sprejeti odločitve o hrambi v zgodnji fazi življenjske dobe zapisov. Vrednotenje je »demokratično« v smislu, da si je prizadevalo pustiti popolno sliko finske družbe v arhivih. To se je odrazilo v metodah vzorčenja, ki so z napredovanjem digitalizacije izgubile svojo priljubljenost. Vrednotenje je označeno kot napol-jenkinsonsko v smislu, da se odločitve o trajni hrambi sprejemajo v sodelovanju z organi v državni in občinski upravi. Od osemdesetih let prejšnjega stoletja so bili načrti za upravljanje dokumentov bistven del procesov vrednotenja. Trenutni izzivi vrednotenja med drugim vključujejo tudi potrebo po vrednotenju funkcij okolice (kot sta zdravstvo ali socialno varstvo) namesto evidenc posameznih agencij.*

**Ključne besede:** vrednotenje, vzorčenje, odstranjevanje, arhivska zgodovina, Finska

First formal decision about archival appraisal of public records took place in year 1866 when Imperial Senate purged some of its records. First plans for appraisal were made in year 1883. The person behind this was head of the National Archives of Finland, State Archivist Reinhold Hausen (1850–1942) who was active also when some financial records were purged in year 1906. Hausen was not the first State Archivist to have interest in appraisal (Lybeck, 2014, pp. 308–309), but he was progressive in his ideas. While Hausen in many ways was a typical archivist-paleographer of his era and interested in publication of medieval documents (Litzen, 2000) he also understood need to restrict flood of records to the National Archives and did not hesitate to take an active role in appraisal. However, at Hausen's time there was no legal mandate for the National Archives to make decisions about appraisal. The decisions were made formally by the Senate or one of its ministries and only prepared by the National Archives. Some records were destroyed also without any authorization. (Lybeck, 2016b, pp. 159–175; Mäenpää, 1994.)

First Archives Act was enacted in year 1939. The purpose of the act was more to protect records than to limit their number. Therefore, it stated that records of government and municipal agencies could be destroyed only with permission of the National Archives. This gave the National Archives a decisive, but passive role in appraisal: it could not act on its own initiative and give orders about disposition of records. (Lybeck, 2016a, pp. 179.)

Even before this in year 1936 a committee – with State Archivist K. V. Blomstedt as its sole member – had been given the task to consider issues of archival appraisal. Blomstedt visited Denmark and Sweden and brought to Finland idea of proactive appraisal. This has had lasting influence on Finnish appraisal practices. In Sweden proactive appraisal had been defended by arguments from archival theory. It was argued that destroying records in a fonds violated principle of provenance. Therefore, it was better to destroy records before they were annexed to the fonds – naturally, this was to happen without endangering the fonds as evidence of activities behind its creation. In Finland, Blomstedt did not resort to theoretical arguments. His grounds for proactive appraisal were purely practical: retrospective appraisal was time-consuming and labor-intensive, unless there was a large number of similar records that could be purged at once. (Mäenpää, 1994.)

Blomstedt noted that making decisions about appraisal would be an overwhelming task for one person. Therefore, and again following Swedish example, Committee for Reduction of Archival Documents (*Arkistoaineisten supistamiskomitea*) was founded in year 1947. The committee was in existence until the year 1970. It was chaired by State Archivist. Other members included representatives from provincial administration, Evangelic-Lutheran Church, Postal and Telegraph Service, and Ministry of Justice. The committee consulted historians and other specialists in its work. In practice, it drafted proposals for appraisal which were then approved by the National Archives. Inclusion of researchers was successful, and the work of the committee was generally productive. (Mäenpää, 1994; Nuorteva & Happonen, 2016, pp. 237–241.)

Thus, agencies were involved in the appraisal process. Besides proactive approach, this has been a characteristic of Finnish appraisal since. Therefore, Finnish appraisal has been described as “semi-jenkinsonian” (Voutilainen et al., 2020). In the beginning involving agencies was not easy. Agencies were unfamiliar with the concept of appraisal and with needs of researchers. Therefore, when the committee asked agencies to suggest records that might be destroyed, the agencies were often unable to identify any or they found only few records belonging to this group. Sometimes they suggested purging such records that are generally considered to have permanent value. (Mäenpää, 1994.)

Proactive appraisal was formulated for the first time in instructions for municipal agencies in year 1941. The instructions stated that records with limited retention time should be put in series of their own and the retention time should be noted in the archival inventory so that these records could be later easily separated from others. (Lybeck, 2016a, pp. 202.) It was customary to take disposal actions on series level. It was also suggested that registry office might mark retention times on files when they are created (Blomstedt, 1947, pp. 7–8). This practice was never recommended by the National Archives, but nevertheless, it was the practice that was followed occasionally, at least in the archives of one of provincial governments (T. Voutilainen, personal communication, 29 November 2021).

The National Archives of Finland had adopted early in the 20<sup>th</sup> century a records' classification scheme from Sweden. The scheme was very simple. The records were divided in main series according to their form regardless of subject matter; "Registry books", "Lists and Inventories", "Minutes", "Incoming letters", "Outgoing letters", "Financial Records", etc. Every main series was identified by a capital letter and subseries by one or more minuscules. Thus, for instance, the series for registry books – this was main series (*A*) in scheme's Finnish version which differed from the Swedish in some details – was usually divided into two sub-series: registry books in matters that were initiated by government agencies (*Aa*) and registry books for other matters (*Ab*). This "ABC-scheme" was created by Swedish State Archivist Emil Hildebrand in year 1903. Internally it was applied in the National Archives of Finland to a fonds in year 1911 (Lybeck, 2016b), but the National Archives began to promulgate its wider use in state and municipal agencies only in the 1940's. (Orrman, 2019a.)

ABC-scheme was in effect a simple indexing language. Its disadvantage was that it did not reveal anything about the functions of an agency or subject matters that the agency dealt with. On the positive side, this made the scheme generally applicable: regardless of their functions all government and municipal organizations had registries, they sent and received letters, kept track of financial transactions, etc. The scheme brought across fonds welcome uniformity, and therefore, it was favored in the National Archives in comparison to functional classifications. (About discussion, see e.g. Haila, 2018; Jääskeläinen, 2000.) The ABC-scheme dominated knowledge organization in Finnish archives and records management until functional classifications gradually replaced it in last decades of the 20<sup>th</sup> century. ABC-scheme was still the model to be followed when the National Archives gave instructions to municipal archives in year 1979 (Orrman, 2019a).

Instructions for municipal authorities (1941) stated that records whose "permanent retention appears to be clearly unnecessary" should be put in a series of their own, if possible (Valtionarkisto, 1941, pp. 9). Government agencies were instructed to take care that it is possible to purge larger sets of records "according to a pre-existing plan" instead of individual documents one by one (Virastotyö tehokkaaksi III, 1948, pp. 50). It was said that registry classification scheme should be such that one class in a registry should contain only records with identical retention time (Arkistolaitos, 1995, pp. 12; Asiakirjojen käsittely ja säilytys, 1984, pp. 27). At least one agency, Provincial government in Mikkeli, purged records by their registry class, but it is not known how widespread this practice was (T. Voutilainen, personal communication, 29 November 2021).

ABC Scheme was applied mainly to records of permanent value, but sometimes ephemeral series were included in it. An example of inclusion of ephemeral series can be found in instructions for the Finnish Defence Forces (1974). The instructions stated that main series *J* was to be divided into three sub-series according to retention time of records; *Ja* was for records to be purged after one year, *Jb* after three years, and *Jc* after ten years.

These sub-series had further subdivisions. For instance, "General orders for the garrison" was one of the series to be purged after three years, sub-sub-series *Jbd*. (Puolustusvoimain arkistokaava ja kirjelmäryhmitys, 1974).

In short, although the idea of proactive appraisal was adopted in the 1930's full realization of the idea took decades. For a long time, there was often need for retrospective disposal actions. Despite guidance and archival education, agencies did not have interest in making proposals about records' disposal to the National Archives. Only when there was no storage space left they simply suggested most space consuming records to be purged without consideration for needs of record keeping. (Haila, 2018, pp. 33) From the 1950's the Committee for Reduction of Archival Documents prepared disposition plans whose purpose was to reduce number of records to be preserved. (Lybeck, 2016a, pp. 181). First decision about retention times for ephemeral records is from year 1951 (Haila, 2018, pp. 9).

### Experiments in sampling

One has tried in Finland to get in archives a representative picture of the society instead of documenting only exceptional events and elites (Lybeck, 2000). To attain representativeness records sampling has been a popular in Finnish appraisal. Many of the sampling methods are adaptations of common statistical methods. For instance, both random sampling and systematic sampling method have been used in Finland (Leppänen, 1995; for sampling methods, see Coessens & Heirman, 2020). Only a sample of records has been preserved in cases in which the records are voluminous, or mostly identical, and their information content is limited or rarely unique (Leppänen, 1999).

Sampling or – to be more exact, how a sampling method is applied – is not without weaknesses. For instance, in year 1990 the National Archives decided that records from debt recovery proceedings would be preserved permanently only if they were dated in a year ending with zero. When economic crisis hit Finland hard in the beginning of the 1990's, this decision meant that information from this catastrophic period would be incomplete. The appraisal decision was quickly modified, but some of the records had already been destroyed (M. Leppänen, personal communication, 27 May 2006).

Sometimes decisions about permanent preservation have been unclear and open for multiple interpretations. The National Archives has in some cases stated that records from every fifth year are to be preserved permanently but left undefined what "every fifth year" means. Administrative processes often span multiple years. Some agencies took the year when an administrative process began as the starting point, others the ending year. Thus, the result was inconsistent, and the files preserved disparate. Naturally, this is an outcome from inadequate instructions and insufficient guidance, not a fault of the sampling method (T. Voutilainen, personal communication, 29 November 2021).

Most interesting sampling methods are those that have been devised particularly for records sampling. Birthday sampling is perhaps typical for Nordic countries. It has been applied to voluminous medical records, among others (Vallenius, 2021). In birthday sampling records of persons born on specific days of month are preserved; in Finland, these days are 8th, 18th, and 28th. In other Nordic countries the days are different, but the principle is same. The idea is that preserving information about same persons in different fonds gives researchers most versatile view on the life of individuals and allows usage of this information in various combinations. (Leppänen, 1995; Orrman, 2019b; Orrman, 2019c). It also enables following some persons' life span from cradle to grave (Vallenius, 2021).

Other sampling experiments have included type fonds and Mini-Finland. A "type fonds" is preserved more completely than other similar fonds, that is, fonds from agencies having the same function. Thus, it is a type fonds is an example of a fonds that has not gone through the appraisal process. Often type fonds belong to agencies in "mini-Finland." Mini-Finland was a set of areas that the National Archives compiled in the 1950's together with the Central Office for Statistics. The idea was that one would preserve more records from these areas, and thus, have a representative sample of the whole country (Leppänen, 1995; Orrman, 2019b, 2019c).

Today sampling is largely forgotten as a method for appraisal. Yearly accrual became too large which forced to abandon the concept of type fonds in the 1980's. Mini-Finland was challenged by changing administrative structures and borders. Birthday sampling was also a disappointment. Birthday sampling did not serve medical research like it was hoped. For instance, it is not useful in tracking hereditary diseases (Vallenius, 2021). However, the most important reason for the disfavor of sampling methods is that in digital environment they do not bring significant savings in storage space. On the other hand, it must be noted that the need to minimize preservation of personal data has again revitalized interest in archival sampling (T. Voutilainen, personal communication, 29 November 2021).

## EMERGENCE OF RECORDS MANAGEMENT PLANS

Next significant step in Finnish appraisal was paradigm change in the 1970's. At that time attention shifted from archives as historical accumulations of records to information management in government and municipal agencies. Interest in information management had risen already in the 1940's and 1950's, but now creation of a fonds became the focus of archival thinking and practices. In modern terms this might be seen as development of records management, but at what point Finnish records management is born is debatable and depends on what is understood by the concept. Practice of keeping registries had always kept archives in close contact with daily work in organizations. In addition, proactive appraisal may be seen as "records management" of a kind. (Lybeck, 2016a, pp. 176, pp. 217–218.) On the other hand, if records management means looking records solely from organizational perspective by a profession that it is distinct from the archivists, Finnish public sector organizations may still lack records management.

Already in the 1960's it had become increasingly clear that expanding administration required more flexible approaches. Quantity, quality, and content of records was simply too diversified to be managed by the now old-fashioned ABC-schema. Although the National Archives was still satisfied with it, the schema did not serve agencies in their work. Thus, a gap was forming between archives and work practices in the agencies. At the same time, appraisal had to be intensified. In the 1970's about one third of records was preserved permanently. This was too much. The new goal was now to preserve 15–20 % of records. This required more stringent disposal measures (Haila, 2018, pp. 39).

It seems evident that one of the problems was that the National Archives operated blind-folded. The 1941 instructions for municipal agencies stated that

"...all records belonging to the municipal archives are to be preserved if the legislation does not state otherwise. Records that are unnecessary may be nevertheless purged with the permission, or following the instructions... of the National Archives" (Valtionarkisto, 1941).

From this one may conclude that the National Archives could not have the big picture of records in municipal agencies. It was notified of the existence of records only when one wanted to purge them. Secondly, the National Archives could not act without initiative of an agency. In this situation setting national goals for appraisal must have been challenging. There were different ideas about what should be done. The situation was problematic for many reasons. A breakthrough was idea that archivist should be able to proactively and systematically steer how a fonds is formed in the work of an agency (Lampela, 2016, pp. 21). The older Archives Act of 1939 had excluded registration and filing from the domain of archives management, but as a sign of the new approach they became under its control in year 1981 in the new Archives Act (Orrman, 2015).

A new tool for planning records' life span had appeared in the middle of the 1970's in the courses of the National Archives (Haila, 2018, pp. 45). The new Archives Act (1981) made this new tool mandatory for every government and municipal agency. The act stipulated that every government and municipal agency must have a Records Management Plan (*arkistonmuodostussuunnitelma*, literally "Archives Creation Plan"). Similar plans (in Swedish *arkivbildningsplan*) had existed in Sweden since the 1960's, but unlike in Sweden, in Finland agencies were now obliged by law to maintain such a plan (Lybeck, 2006, pp. 79).

In a Records Management Plan all the records created by the agency are grouped by function in which they are created or received. The plan indicates the retention times, whether the records are registered, and lists places where they are stored first short time and then for longer periods. The plan also shows the arrangement of records and their series in the physical fonds if the retention time warrants such a location; most records do not need it. Thus, from the plan one gets comprehensively information about records' context, management, and archival organization (Lampela, 2016, pp. 32).

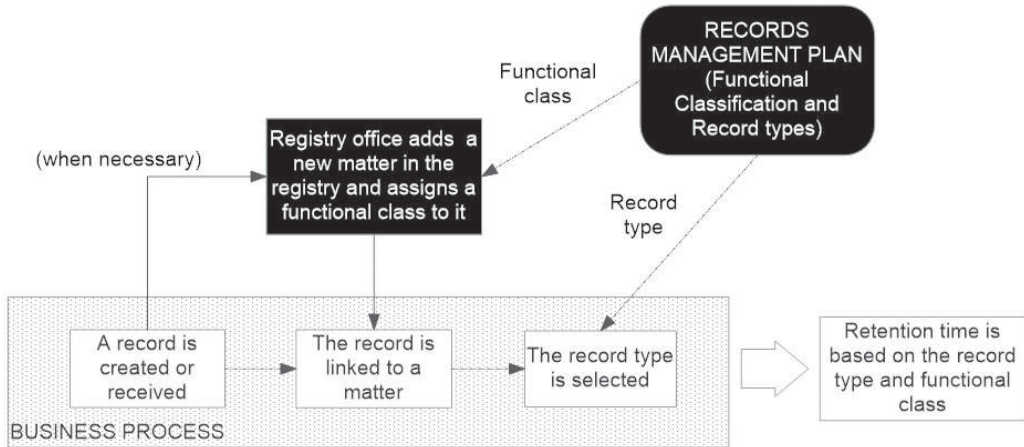
Records Management Plans are still a requirement stipulated in the Archives Act. They are significant for number of reasons. Firstly, although it is possible to apply the plans retrospectively, they are about records that are to be created or received in the administration. Thus, they made proactive appraisal the norm to be followed.

Secondly, Records Management Plans integrate records continuum (Valtonen, 2005, pp. 49). The plans ideally serve different stakeholders, although in practice keeping them up to date has been difficult and they have been underutilized in agencies (Lampela, 2016, pp. 32–33; Lybeck, 2000):

1. For administration, the plans are a guidebook to be followed in its daily work.
2. The plans serve content-based information retrieval because in them records with similar content and function are grouped together.
3. For records management, the plans enable efficient planning and steering of records processes and record life span.
4. For the National Archives the plans are disposition proposals. The National Archives accepts the plans and uses them to select part of the records that is to be later preserved in its custody permanently.
5. The plans also collect from the agencies information that can be used in archival descriptions.

In the core of the plans is a functional classification in which all record types were listed. Retention time is defined by combination of functional classification and record type: for instance, an incoming letter in function A may have a different retention time from other records created in the same function and from incoming letters in function B. This allows making finely tuned decisions about what information is to be preserved.

## APPRAISAL IN ELECTRONIC RECORDS MANAGEMENT SYSTEMS



**Figure 1: Managing records' life span in SÄHKE1**

Thus, Finnish archival thinking was geared towards proactive and function-based records management already in the 1980's before digitalization. By the turn of this century Finnish government was taking further actions to develop public sector information management. The National Archives was given the task to develop long term preservation of electronic records. This eventually led to development of functional requirements for Finnish electronic records management systems. Evaluation of electronic records management systems in year 2002 had revealed that systems in use were not adequate for management of electronic records. They were built on software from foreign vendors, and consequently, often lacked or did not fully support special characteristics of Finnish recordkeeping; proactive appraisal, Records Management Plans, and keeping registries. Therefore, in 2005 the National Archives published its own specification for functional requirements (SÄHKE1) in which these national features were considered (Pohjola & Happonen, 2014).

In SÄHKE1 compatible systems a record stored in the system gets its retention time and other critical metadata values from the system's Records Management Plan (see Fig. 1). The values determining retention time are based on the record's functional class and type.

In the second version of SÄHKE (2008) Records Management Plan was separated to a system of its own. The idea was that this new information system (called "Information Control System") would take care of management processes and interact with other information systems via application programming interfaces (APIs). The Information Control System would automate records management processes across the organization and be a general source of metadata. Unfortunately, this vision has had only limited success outside electronic records management systems.

### FINNISH THEORY OF APPRAISAL – OR LACK OF IT

Public theoretical discussion has been practically non-existent. Finnish approach to archival appraisal has been described as pragmatic. There has not been a "grand theory" that would guide decisions about appraisal. It has been argued that this is actually a strength, because it safeguards appraisal from bias: a flaw in the grand theory would be reflected in all decisions that are based on it, but decisions made from purely pragmatic point of view are sometimes good and sometimes bad (Lybeck, 2000).

In "Appraisal 2000" -project the National Archives examined its tradition critically, codified, and refined principles of appraisal for the first time while it also tried to enhance quality

of appraisal by applying new principles. Instead of creating a "grand theory" the goal was to create "a balanced view that takes different perspectives and approaches into account." (Lybeck, 2000). Appraisal of the National Archives was described as "practical, down to earth approach that is proactive and founded upon co-operation with the agencies" (Repo-Lehikoinen, 2001). The result was for the first time (2008) a document describing appraisal policy and a manual for those who drafted appraisal decisions in the National Archives.

Finnish appraisal tradition is clearly a compilation of influences from many sources. Schellenberg's value theory has been very influential in Finland (Lybeck, 2000). Sweden and Germany were important models for appraisal in the 1920's and in the 1930's, although it is difficult to point out ideas and practices that came from a particular country. Term *seulonta* (separating important from non-important) is probably of German origin (*Sichtung*). Idea of importance of administrative hierarchy was probably adopted from Germany. Furthermore, principle of preserving a copy of sent letters in archives follows a German model. On the other hand, interest in sampling methods has Swedish origin and Sweden has altogether had bigger influence in Finnish appraisal than Germany (Lybeck, 1998).

The appraisal policy documents have been revised twice since, in years 2012 and 2020. Macro-appraisal is perhaps now more clearly than ever starting point for appraisal process, although macro-appraisal was included already in the 2008 versions of policy documents (Arkistolaitos, 2008a; Arkistolaitos, 2008b). After macro-appraisal – evaluation of functions and actors – focus is shifts to content of the records, to form in which the information is to be preserved (born digital information is now preserved digitally as a rule) and costs of preservation (Kansallisarkisto, 2020).

## CURRENT CHALLENGES OF APPRAISAL

Finnish appraisal is currently challenged in three ways, at least. The first challenge comes from legislation. The current Archives Act (1994) is outdated and conflicts with more recent legislation and with the General Data Protection Regulation of the European Union. Therefore, the Archives Act will be renewed in years to come. At this point also appraisal process in public administration and the role of the National Archives may be re-examined. A new requirement is that long-term preservation must have legal basis and, hence, the new law must be written to support decisions about appraisal. Until now grounds for long term preservation have been in the discretion of the National Archives (Tiedonhallinnan lainsäädännön kehittämislinjaukset, 2017, pp. 141).

Second change is a consequence of the digitalization. Before digitalization appraisal and accessioning of records were more in the domain of recordkeeping professionals. In past when representatives of the National Archives discussed disposal with an agency, they were usually confronted with its records manager or archivist. In digital environment appraisal process has become more complex. Privacy issues must be considered in a new way. Because of technological questions disposal may be complicated and expensive. Data may have value as "new oil." In short, there are more stakeholders to appraisal. Therefore, when an archivist from the National Archives today meets people from an agency there is often a spectrum of professionals to negotiate with; besides recordkeeping professionals, there are other information professionals, managers, ICT-professionals, and lawyers.

Thirdly, digitalization challenges traditional agency-based paradigm of Finnish archival appraisal. From the point of view regulations, appraisal still takes place either organisation by organisation (e.g., police department by police department), or at its best, by appraising similar organisations at one stroke (making decisions that apply to all the police departments).



However, one should be able to appraise ambient functions. In any field of the modern networked society there are today multiple actors in interaction. Therefore, ideally one could appraise fields like "social welfare" or "health care" as a whole: to have first the big picture of actors, interrelated functions, information flows, and systems, and only then make decisions about what is important enough to be preserved. Generally, this is not possible. Agencies make and renew their Records Management Plans independently and sometimes in separation from others working in the same field. The plans come to the National Archives for approval at different times one by one. Thus, appraisal decisions are piecemeal. The National Archives combats this fragmentation by encouraging co-operation and branches of administration to making joint disposal proposals for their sector (for instance, National Courts Administration on behalf of all the courts) but currently this is not required in the legislation.

Fourthly, shared information systems are problematic. Agencies may have a legal obligation to deliver their data to a shared information system, but in legislation no-one has been given responsibility to preserve this information. Data in a shared system may also duplicate data in the agency (T. Voutilainen, personal communication, 29 November 2021). Finally, the National Archives still needs the initiative of an agency: appraisal process starts when an agency sends its Records Management Plan to the National Archives for approval. The National Archives would like to have a more active role, but also this requires changes in the legislation.

In summary, current situation requires corrective legislative actions, and, in addition, new methods that allow appraisal transcending organisational borders. The current Archives Act (1994) will be renewed in years to come. Hopefully, it will be a step forward.

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## SOME CONSIDERATIONS ON ARCHIVAL APPRAISAL FOR PERMANENT RECORDS IN ROMANIA

### Abstract

*This paper presents the principles and criteria used for archival appraisal presented in professional literature in Romania. It starts by making terminological clarifications, then presents the concept of National Archival Heritage, as an umbrella term for all records bearing permanent (historical/archival) value. Then, by using the professional methodologies or professional articles as a source, it presents the types of values considered, principles and criteria used, and some solutions used in practice. The critical reading of all these shows that sometimes the used terms and the promoted criteria are not sufficiently clear and usable, leaving a great space for the lack of predictability and consistency. While subjectivism may be beneficial in principle, it may become an issue when it impacts the efforts for preservation. The situation may be regarded as critical also by considering the new challenges that come from the electronic environment for creation of records. At the end, instead of conclusion, the author is trying to draw some more specific background principles to guide the appraisal, and to define some generic area to better filter the records.*

**Keywords:** *archival appraisal, contextual value, informational value, historical value*

## ALCUNE CONSIDERAZIONI SULLA VALUTAZIONE D'ARCHIVIO PER I DOCUMENTI PERMANENTI IN ROMANIA

### Sintesi

*Questo articolo presenta i principi criteri utilizzati per la valutazione d'archivio nella letteratura professionale in Romania. Parte da chiarimenti terminologici, poi presenta il concetto di patrimonio archivistico nazionale, come termine generico per tutti i documenti che hanno un valore permanente (storico/archivistico). Quindi, utilizzando come fonte le metodologie professionali o gli articoli professionali, vengono presentati i tipi di valori considerati, i principi dei criteri utilizzati ed alcune soluzioni utilizzate nella pratica. La lettura critica di tutto ciò mostra che talvolta i termini utilizzati e i criteri promossi non sono sufficientemente chiari e fruibili, lasciando ampio spazio alla mancanza di prevedibilità e coerenza. Mentre il soggettivismo può essere un vantaggio in linea di principio, può diventare un problema quando ha un impatto sullo sforzo di conservazione. La situazione può essere considerata critica anche considerando le nuove sfide che provengono dall'ambiente elettronico per la creazione di record. Alla fine, invece della conclusione, l'autore cerca di trarre alcuni principi di base più specifici per guidare la valutazione e di definire alcune aree generiche per meglio filtrare i documenti.*

**Parole chiave:** *valutazione archivistica, valore contestuale, valore informativo, valore storico*

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## NEKAJ RAZMISLEKOV O VREDNOTENJU TRAJNIH DOKUMENTOV V ROMUNIJU

### **Povzetek**

*V tem prispevku so predstavljena načela in merila, ki se uporabljajo za arhivsko vrednotenje, predstavljena v strokovni literaturi v Romuniji. Začne se s terminološkimi pojasnili, nato pa se predstavi koncept narodne arhivske dediščine kot krovnega pojma za vse zapise, ki imajo trajno (zgodovinsko/arhivsko) vrednost. Nato se z uporabo strokovnih metodologij ali strokovnih člankov kot vira predstavi vrste obravnavanih vrednot, uporabljena načela in merila ter nekatere rešitve, ki se uporabljajo v praksi. Kritično branje vsega tega kaže, da včasih uporabljeni izrazi in promovirana merila niso dovolj jasna in uporabna, kar pušča prostor za pomanjkanje predvidljivosti in doslednosti. Čeprav je subjektivizem lahko načeloma koristen, lahko postane problem, ko vpliva na prizadevanja za ohranitev. Situacijo lahko štejejo za kritično tudi ob upoštevanju novih izzivov, ki prihajajo iz elektronskega okolja za ustvarjanje zapisov. Na koncu, namesto zaključka, poskuša avtor definirati nekaj bolj specifičnih izhodiščnih načel, ki bi vodila vrednotenje, in opredeliti generično področje za boljše filtriranje zapisov.*

*Ključne besede: vrednotenje, kontekstualni vrednost, informacijska vrednost, zgodovinska vrednost.*

Archival appraisal is a very dear topic to archivists. There is a huge amount of professional literature on appraisal, offering a wide range of perspectives (Duranti & Franks, 2015, pp. 214-217), spreading from the enthusiastic "*the most important/difficult part of the archival job*" (Cox, 2004, pp. 276; Adamache, 1989, pp. 287; Coman, 1982, pp. 370) to the skeptical "*one way to distort the history*" (Cox, 2006, pp. 240-241). Probably a whole book could be devoted only to a bibliography of the matter.

In the following, I shall present briefly archival appraisal in Romania: the vocabulary, the current system and some critical remarks on it, and possible lines of evolution.

## TERMINOLOGICAL STATEMENT

I would like to start by examining the terminology used. Traditionally, appraisal is an "*assessment of records to determine their value as primary source material, providing evidence of the history of the organization, family or individual*" (Crockett, 2016, pp. 141). But the terminology designating the determination of the values of records and actions associated with it encompass also some other terms, like *selection*, or *disposition*.

a). In Romania, traditionally the term *selection* was used. For several years, in 1950s-1960s, the official designation was *analyse* ("expertizare"), defined as "*detailed study of the records content contained in the archival units in order to determine their political, scientific and practical importance*" (Arhivele Statului, 1962, pp. 3). Later, the term *selection* was again officially endorsed by legislation, meaning "*the operation of establishing the historical-documentary or practical values of the archival units from a fond or a collection, with the aim of permanent preservation of those part of the National Archival Heritage or disposition of those lacking importance*" (Arhivele Statului, 1982, pp. 211). In the latest years, selection is defined only as "*operation of disposition of records or records units from an archival fond when the retention periods expired*" (\*\*\*, Ordin nr. 137 din 27 septembrie 2013 pentru aprobarea Normelor metodologice privind aplicarea unor dispoziții ale Legii Arhivelor Naționale nr. 16/1996, 2013).

The hesitation of use between "*selection*" and "*analyse*" is very likely due to the source of authority. The term "*selection*" was very likely used based on Italian influence, while the term "*analyse*" was adopted under Soviet influence, in the 1950s. If these identifications are correct, the rollback to the original term may be considered directly connected with Romanian Government's attitude of "*independence*" within the Communist block, started in the 1960s. A second remark is the fact that the definition of selection covers in fact several actions. On the one hand, it is about appraising the value of records for retention; on the other, appraising for disposal. While obviously the original meaning was identifying the valuable records, in practice the activity of selection comes to be considered synonym to disposal. Another aspect is that nor "*historical-documentary*", nor "*practical*" values are defined in a regulative paper, but only in professional glossaries. We shall elaborate more below on this distinction, but we would like to emphasize that the two terms have an outstanding importance in separating records, though their meaning is very much inconsistent.

The last definition, which simplifies the complex process of assessment of records, is today the only definition with legal value in Romania! It reflects a late trend within the National Archives to regulate specific situations, disregarding the whole picture of the archival appraisal domain.

b). Another important distinction is the use of term "*permanent*". According to Romanian archival regulatory framework and methodology, "*permanent records*" or "*records that are preserved permanently*" are those record with "*historical and documentary*

value". In a new project of law on archives, the term "archival value" was also used for indicating permanent records.

For the purposes of present paper, I shall focus mainly on appraisal, that is on the action of assess the archival value of the records, where by *archival value* I understand the estimated long term relevance of records for various users of the archives, either groups or individuals.

## TIMELINE OF THE APPRAISAL

The current methodological framework states implicit and explicit moments for appraisal. The *implicit moment* is the when retention schedule is created. Assigning retention periods implies an activity of appraisal, which I like to call "prospective", since it is, more or less, an estimative value for the records, before the records are created and used. The explicit appraisal of records occurs at the moment of disposition, when it is decided which archival materials has the retention period expired. This explicit appraisal I call "retrospective", since it is ulterior to the moment of creation. Apparently, this is a more limited that appraisal, as it is defined today in ISO 15489:2016 and ISO 21946:2018.

In fact, at a closer look, it may not be the case. In practice, there are some stages of appraisal that occur, but they are not clearly identified as such. For instance, for paper records, the grouping of records into folders in order to be send to the storage room implies an examination of copies or notes that exists, in order to determine if they are convenience records or contain relevant information for the organisational process; that is, to determine if they are records or mere documents. In the past, this kind of "appraisal" should be also done under the supervision of a commission (Dinu & Nicula, 1978, pp. 445), but today it is not prescribed anymore.

Also, before the records are transferred to the Archives, in theory, the inventories containing those records that were set initially as being of permanent value, and those retained in the process of disposition as having this value<sup>2</sup> are the transfer lists. In fact, scrutinizing the inventories or even in the process of transfer and verification, some items may be "appraised" as not being of permanent value and discarded. Lastly, even those pre-checks may fail and in time, it may be considered that some records may not possess the estimated permanent values and they are subject to a "re-appraisal"<sup>3</sup>.

As such, I am inclined to remark that the latest definition of appraisal presented in international standards, seems more faithful to the process, at least in Romanian case. The second remark is that, with a proper articulation of concept, appropriate controls can be applied, so the effectiveness of the process may increase, so here it is an area of improvement of the current methodological framework.

## THE BODY OF "PERMANENT" RECORDS

As most of the ex-communist countries, Romania shares a concept that aim to designate the body of all permanent records: National Archival Heritage. The name of the concept may be misleading. The term was often translated as State/National Archival funds/fonds, translating the terminology in original languages, where the term used is rather similar to the concept of "(archival) fonds". In fact, definition (at least in Romanian) refers to the *permanent records*, not to *the body of records having the same creator*. The

2 This may happen in general for 2 reasons: 1. It was overridden the retention schedules periods, due to reevaluation of the initial rationale; 2. Those records were not categorized at all initially in the retention schedule.

3 However, in Romanian, the term used is the same as in the other phases, that is "selecționare".

meaning (and even the wording in Romanian) is the same with "cultural heritage", so, for a proper English translation, I shall use the term as National Archival Heritage<sup>4</sup>.

The concept also recorded some transformations. Before 1950, such concept did not exist in Romanian archival theory and practice. Drafted in 1953, obviously following the Soviet model, it was officially proclaimed in 1957, as State Archival Heritage. In 1971, not surprisingly aligned with the national-communist policy promoted by Nicolae Ceausescu, the term was renamed as "National Archival Heritage", concept that was taken over as such in the post-communist legislation. (Popovici, 2008)

For the past 60 years, little changes in the definition of this concept occurred. In 1957 (\*\*\*, 1957) it was stated that the purpose for establishing the State Archival Heritage as "to ensure the centralized register, preservation and use of documentary materials for scientific and practical purposes".

In 1971, the concept became more inclusive: the name was changed to National Archival Heritage and covered all records based on their "*scientific and practical value and importance and not by its creator or owner*" (Arhivele Statului, 1982, pp. 121–122). Except for some wording, the actual legal definition is mostly the same.

While the form of protection of all records, no matter the creator, may seem legit and inspiring<sup>5</sup>, some questions still arise. The first one is the feasibility: can the government monitor all records creators in Romania? In my opinion, this is an impossible logistic goal and even an undesirable cultural memorial goal<sup>6</sup>. In order to attempt to achieve, it would be necessary at least to filter the relevant creators, and this add a new level of archival appraisal, "the creator": who are those organisations (or natural persons!) that have to be monitored as part of the NAH? Surprisingly, however, in Romania there were not—and still there is not—any reference list of NAH creators that are officially monitored. And while logistic problems are obvious, the policy of "foggy" area of competences continues to have no formal resolution, since it offers the liberty of decision from one case to another.

One other hidden flaw of the definition of NAH is the collision with cultural heritage area, that is governed by a distinct legislation in Romania. The definition in archival legislation would include all historical records in NAH, even those preserved as individual pieces in libraries or museums. In theory, they should be managed according to archival legislation. But those memory institutions are governed by a different law, which govern the protection of cultural heritage. In order to clarify this situation, that law limit the NAH to those records preserved by the National Archives (and thus, excluding permanent records held by the creators), and include NAH in the National Cultural Heritage

4 I recall the fact that, because of the misuse of the term, Michel Duchein mistakenly claimed that it is the case of a *single archival fonds at the country level* (Duchein, 1992, pp. 16). In fact, the archival fonds exists in their own state, but, across these fonds, all the records with permanent values are abstractly designated as National (State) Archival Heritage. And that this is an abstract concept is showed by the fact in 1957 the name of the piece of legislation was "Decree for establishing the State Archival Heritage". Or, since the records or the archival fonds existed long time before the „establishment“, it is obvious this is an administrative concept, independent of the creators and the records produced by them.

5 A quasi-similar approach seems to be the Canadian "total archive", though some authors claimed their approach is a „uniquely Canadian practice" (Sheffield, s.d.). In our opinion, the author's claim for uniqueness, based on 4 tenents, is unsustainable. It also worth reminding that the feasibility of the approach was questioned (Miller, 1996; Miller, 1998).

6 Without stressing this aspect, since it tangential in the frame of this paper, modern research showed convincingly that no matter how professional National Archives staff may be, monopoly over the management of the past traces may lead to a deformed history. From this point of view, it may be really undesirable that the State, through its one (or a few) institution(s), to be delegated to collect all documentary traces of the past. (Blouin jr. & Rosenberg, 2013, pp. 158–160; Popovici, 2011, pp. 261–262).



(\*\*\*, 2014, pp. art. 6., al. 2.). These provisions have also unanticipated legal and practical implications. According to Romanian law, all goods part of the National Cultural Heritage needs to be monetary appraised (\*\*\*, 2019). And, consequently, records must be financially valued. Such activities began in 1981, when archivists took record by record (starting with old ones) and set prices to them, based on certain criteria. As a result of this overwhelming practice (which never reached an end), in an intervention, the then deputy director of the Romanian State Archives stated that not all records in NAH are in fact part of the Cultural treasure (Arimia, 1985, pp. 351) <sup>7</sup>. But this approach opened a new line of thinking for some: records are no longer regarded based on fonds they belong, but on their status of being or not part of the cultural heritage...

As a preliminary conclusion, though Romanian archival legislation designates the whole of permanent records with a special term, its usefulness can be questioned. It is not accompanied by explicit and formal criteria for identifying permanent records. The grouping of records based on their value is rather museal than archival; hence, records tend to be regarded in a decontextualized manner, as items, rather than collectively, interrelated, based on provenance. In the same time, the overall coverage, from government to banks and from education to industry, is a heavy task, which has impact on the way appraisal should be approached.

## APPROACHES FOR APPRAISAL OF PERMANENT RECORDS

The coherence of the legislation in the last 60 years allows for a sort of continuum of practice in the effort to identify the theoretical and methodological ground helping archivists to make appraisal decision.

### TYPE OF VALUES

The standard differentiation when the generic Romanian archivist talks about values of records is "the historical and documentary" and "practical", and sometimes "legal". There is no formal definition for these terms, but the *Dictionary of Auxiliary Sciences of History* define the documentary -historical value as "*the importance of the historical and documentary (sic!) information that are included in the archival units belonging to a fonds or collection (...). The historical and documentary importance of archival units is given by the value of the information on the social, economic, political, and cultural development of society over the centuries.*" The legal value was defined as "*a propriety transferred to the record by legal norm*". The practical value, on the other hand, is defined as "*the sum of the information contained in an archival unit from a fonds or collection which serves to solve current economic and social problems*".

Though widely used, I find this differentiation of little use, not to mention a sort of insidious patronizing attitude, from the high level of "scientificity" (history—the object of interest of the National Archive) to the mundane "current problems" (practical—object of interest of the creators or public). Personally, I find relevant Schellenberg's remarks: records are primarily made as a documentary evidence of the activities performed by those who have practical needs. Records are not designed to be "historical and documentary" objects; quite the opposite, they result in having this value after their primary utility ceased. So, all records have, initially, a practical or legal value, longer or shorter. On the other hand, all these values are not a "given", but they are contextual. As a Romanian example: lists with refugees from WW2 were considered historical. A compen-

<sup>7</sup> The topic is not settled in a definitive manner until today and periodically it is prompted for implementation.

sation law made those records the main source for the citizens' rights; so, "historical records" become "practical records".

It must also be mentioned that, in 1962, it was officially stated that "political value" for records as a criterium for appraisal. This approach lasted only several years, but, one may say that the political perspective did not vanish, but was included in the historical one.

### "PRINCIPLES" FOR APPRAISAL

It may look strange, but the only guideline that contained principles for appraisal was issued in 1962. Since then, various opinions were only presented in professional articles, but never adopted officially, at least to my knowledge.

In 1962, the (then) State Archives identified three types of values (political, scientific<sup>8</sup> and practical). In order to determine those value, beside some practical indications (using of the retention schedule, prevalence of the higher valued record in case of concurrence of retention periods), it was stated several broad lines to identify permanent records:

- *Small amount of records* kept from a creator will impose permanent preservation for all those records, no matter if, in regular circumstances, those would have been temporary;
- *All records reflecting the history of an organization* from its foundation, including those reflecting the building of communism and those which reveal the living and working conditions of the workers.
- *Records which have political, scientific value*, those referring to economic crisis and to the cultural and commercial relation with the foreign countries
- *Records which have practical relevance* for the work of the socialist organisations (creators)
- *Records which reflect the foundation of collective farms*, their activity and life style of the workers in these farms.

These "principles" reflect quite transparent the immediate political perspective for preserving certain informational content in archives.

Later on, in 1982, an author issued another set of principles (Pușcas, 1982, pp. 243), from which the first 3 were proposed by German-Democrat archivists. Unlike precedent ones, these principles have a more pregnant theoretical ground:

- *the principle of historical conception* = the value of the records is given by the conditions in which the creator of the fonds carried out its activity, the role it played, the position it was in, the duties it had
- *the principle of complexity* = the value of records is determined not only at the level of a single fonds, but also by the relationships between different fonds
- *the principle of multilaterality* = the value of the records is determined based on the relationships in the fonds as a whole.
- *the principle of historicity* = a record is valuable if it has the potential for future use.

Pușcas' principles remained a theoretical effort only, because they were not promoted in the formal guidelines of the State Archives. Their titles may not be quite expressive, but reflect very well the main concerns of the time (visible in other articles too). It is to be underscored the understanding that an assessment of the creator is a main pillar for records appraisal.

8 For the obsession of "scientific" grounding during the Communist regimes see Lucian Boia, *The Scientific Mythology of Communism Bucharest*, Humanitas Publishing House, 2005.

One of the issues in front of the archivists, in socialist countries, is reflected in the second principle. Since the governance of that time was centralised, it implied that most of the organisation were in a hierarchy. As such, some authors suggested that some records series should be kept permanently only at the upper level of decision (Coman, 1982, pp. 371). However, this "principle of complexity" led to some unhappy decisions in practice. Disposal of series at the executive level preserved the only copy of some records series at the decision level; and here, from various reasons, they were lost. As a result, a whole set of relevant information was lost. Moreover, provenance is not only a principle for arrangement, but also one basic principle for searching in the archives: there was a historical Event, there were Agents involved in that Event, so the Agent's Records should contain information about that Event. Attempting a sort of "national scale" appraisal leads to disposal of some records which are normally permanent and looked for in the creator's fonds. Of course, considering the whole of the NAH, this may have a rationale; it also has a rationale from logistic perspective, for optimising storage area. But since the whole of records from one creator is considered the top unit of aggregation of records (at least in Romania), this approach is flawed and deprives the fonds of some relevant records series. On the contrary, "the principle of multilaterality" acts inside the whole of records produced by a creator and thus may balance the preservation of the relevant information for a creator's history.

The last principle reflects a prospective approach, and we shall come again to it below. Essentially, it is an estimation for a potential use, which transforms the appraiser in a fortune teller. As the recent history showed, values and interests of the society can change fast and often unpredicted. Hence, trying to foresee the exact future is almost impossible (Kretzschmar, 2005, pp. 226). Very likely, such decisions would imply a re-appraisal in the future.

### "CRITERIA" FOR APPRAISAL

The inclination for practical aspects of Romanian archivists rather led to a use of "criteria" than "principles" for guiding appraisal. Such criteria were issued several times in methodologies and professional articles. Many of them are repetitive, and many of them relates in fact with the principles above.

*The historical and documentary value of records.* This criterium is the most invoked, despite its imprecision, as I said before. Everything has a history, from a country to science: for whose history must the records be relevant? In some methodological editions, the explanation is very emphatic: "*goods of national interest containing information on significant moments in the past struggle and life of the Romanian people*". In this definition hardly can someone find a place for minorities or for those elements significant for a small community, which has little or no impact to "the nation", as a whole. Being so vague, it is here where the professional and cultural background of the appraiser is vital for a good evaluation. On the other hand, historiography is a moving target and new trends in historical research may only influence future decisions of appraisal.

*Special events (...or remarkable historical moments reflected in records or that created the context for the records to be created).* This criterion reminds very much of "documentation plans" advocated by Hans Boom (Booms, 1991, pp. 28). But again, this is difficult to implement, because "*complex human value concepts can hardly be harmonized to reflect the whole of society*" (Booms, 1991, pp. 29). In any case, there was no explicit documentation plan prepared in National Archives.

*Role and functions of the creators (and his place in the institutional system of our country or his relations with institutions and personalities in our country and abroad).* This criterion is

similar with the principles promoted in macro-appraisal strategy and has a potential for feasibility. Unfortunately, no guidelines for "what is relevant" or "for whom" were produced in Romania. The way it was formulated promotes again the "national whole" and perspective of an age where relations with "foreigners" were exceptions. Also, it is rather intuitive, but arguably, that a train ticket from 2000 would not be considered extremely relevant for a railway historian from 2100.

A rather objective criterion is the *age of the record (and its special features like form, carrier, ornaments, artistic value)*. This is rather a museum approach, looking for exceptional records, rather than those "mundane" evidence of day-to-day activity. Such records document special events, with less documentation in the background.

*Long-time legal or practical value.* While the historical value is opposed to the practical value, it must be admitted that preserved archives from medieval times contains in fact very few "historical valued" records *per se*, but rather records concerning legal and practical useful records. On the other hand, in my opinion, practical utility for a generation or two (that is, 60 years) would not qualify records to be permanent.

*The density of information* is another criterion, presented only in professional literature though. Initially, this was a criterion used to retain for preservation the summative records and not detailed ones, but today it is more and more relevant in the context of medium migration (paper to electronic).

*The quantity of records from a certain age or fonds* is a criterion frequently invoked in Romania, reflecting the reality of many archives lost, both in times of war or peace. Records from a fonds under 0.5 l.m were automatically considered permanent because nothing else remained; also, records under 1920 are not disposable but in special circumstances. There is some room for criticism in this area, because, in my opinion, sometimes 0.5 l.m. of irrelevant record do not help at all in restore past events. Additionally, setting time limits based on historical political events bring little value to the topic. I think that time limits should be connected with recordkeeping policy events, so reflecting a direct impact to the holdings.

A related criterion is the *frequency in the national and universal heritage*. It refers to the situation where the same record may exist at various levels in a centralized system, being derived from the principle of complexity. Hence, the same criticism may be applied: each record has a distinct role in a working process. A repetition of the same record in different organisations or units, apart from the duplication of information, may have a different significance, because it is placed in a different context. Their elimination may fragment the documentation of the process.

A last criterion is *the conservation status of records*. This was only introduced in the last version of the methodology, and it targets the logistics. Many decayed records are not only a burden for the restoration budgets, but also can be a danger to other records, so it a relevant question to ask if deserves transfer to Archives.

As a conclusion, National Archives has developed a system for guiding appraisal, but in my opinion, it is rather broad. Some criteria used in methodologies drawn up have validity, but would need they need further refinement and more guides—which have never been produced. Some indicate a rather vague goals and scope, deriving from an obvious centralized, national-level approach, promoting "THE history" against "a history". Some other criteria though need clarification, as concepts and as implementation suitability. And overall, in my opinion, it needs clarification about what to preserve, why and for which reason. "History" is a big word, but less tangible.

## PRACTICAL APPRAISAL

The criteria mentioned above are present in methodology but, because of their generality, some workarounds are used; the results are not always consistent, though.

By far, the main purpose of the appraisal in National Archives of Romania is to identify and retain the records with "historical" value. In theory, this is presumably attainable by the specific training the archivist had, that is graduates of History. In practice, there are at least 2 issues with this approach: as in any scientific field, studying History once in life does not guarantee a perpetual historical perspective. In fact, I noticed not once that people who are "bureaucrats" (that is, most familiarized with bureaucratic processes) may be more useful in the process of appraisal, being capable to identify the most important records, the most important processes, the most relevant actions in an organization. The second aspect is that in rare cases the general history studied in universities helps coping with small events, small administrative institutions, mainly for archivists who do not work in capitals and dealing with government institutions. So, in my opinion, competences in History is just one tool for the appraiser, that these competences must be periodically updated to be relevant and that lack of other competences can make a History graduate as good appraiser as a specialist in other domain, like management or legal studies.

Beyond competences of the appraiser, it is still unclear for which history can a record be relevant: local history, regional history, country history?... In practice, the source for discerning the "historical interest" comes from 2 directions. First, from a personal "documentation" plan. That is, which events seems memorable for the appraiser, from her/his knowledge: "This was a pyramidal scheme where many people were cheated, so we must preserve the records about this, to show how transition to a market economy occurred". While it can nevertheless bring relevant records, this approach is neither predictable, not consistent. It is just individual experience of an archivist, which makes it as good as any other opinion. The second source for "historical relevance" is the personal observation on the use of records: frequency of a certain topics of research in the reading room, newer historiographic trends etc. While this may also be a valuable source, its flaw is that it is always "reactive", from a moment on, and it will not give an evaluation of that reason: cause of interest, its relevance, potential duration: would a social interest for global warming justify preserving related records from now on? Is this a more relevant topic than others?

Another tool used for appraisal is getting in technicalities, like records type. This is a very convenient method, since it is easier to identify the types and may automatically be assigned to the group of "permanent" or "temporary" and it is materialized in "list of permanent records". Criticism was present in Romanian archival literature, by highlighting that such an approach would de-contextualize the information (Adamache, 1989, pp. 287) and that any document, in a proper context, may represent a historical value (Coman, 1973, pp. 36).

## OTHER CHALLENGES

Beside a need of a more precise guidelines for appraisal, there are several other situations that have impact over the identification of permanent records. Some of this are generated exactly by the imprecision and variability in evaluate records, others by the changing landscape in the production of records.

The tool I mentioned before, combining filing plan and retention schedule, may face several revisions in time. Officially, it should be an organizational structure-based scheme,

but several variants, including functional, can be met in practice. No matter the system adopted, it is subject to revisions or upgrades in time. In most of the cases—and supported by lack of methodological provisions about this situation—codes and retention periods are re-assigned to the various categories comprised. Under these circumstances, previous “permanent records” are downgraded, because of various reasons. Sometimes, it concluded records content did not confirm the prospective value (“too optimistic initial assessment” (Coman, 1982, pp. 347–375). In other cases, general requirements have changed: social (for instance, preserving records about building of socialism) or legal (like payrolls). Also, sometimes it is noticed a “mistake” in previous assessment (and human nature will always tend to improve the work of the predecessors...).

The production of electronic records will raise (if not already did) new challenges. The first and the most visible is that a variability in assigning the retention value and coding categories of records will imply updating systems (which have implemented records controls) at each revision of the retention schedules. And this may be burdensome. Also, the possibility of disposition at the record level (instead of series or file level, as today) will challenge the integrity of documentary flow in permanent records series. Hybrid approach, as that included in Sharepoint, for instance (Lappin, 2019), may need to be formally accepted, modifying the paper logic that exists today. In the case of large systems built on databases, one system may contain many traditional series, so the target of appraisal may need new perspectives, from retaining the whole system, selecting part of the system or “recreation” of traditional series of information by exporting data. Not least, the dematerialisation process, more and more an option for many organisations, would lead to a duplicate of records in different media. And, in case of permanent records, what would prevail: the original artifact or the records used lastly by the creator in its activities?

## **INSTEAD OF CONCLUSIONS: A PROPOSITION**

This paper was rather severe towards the methodology and practice of identifying permanent records, as it exists in the National Archives of Romania. And this may be somehow unfair, since for so long no change occurred, even if the anticipated outcomes are different than the real outcome.

Following this critique, in my opinion it can be possible to create a guideline for determining the concept of archival value of records. And here is my perspective on some general principles and some angles of analyzing records:

- The value of the archive results primarily from the testimony to the creator’s activity and the information contained in the records, and secondarily in its quality as an artefact, a cultural object, of special appearance, rarity, exceptional specimen, etc.
- The value of records can have different degrees of significance for different communities at different points in time. As every record is a testimony, the potential preservation interests are infinite, and, above all, variable over time.
  - Whatever criteria are used to analyse archival value on the long run, they must be applied in an integrated way, looking at the archive from multiple perspectives.
  - As it is not feasible to identify all the future interests of potential users, the focus should be on the preservation of information/records that allow the reconstruction of a creator’s activity in the context of its era.
- The archival value lies in the enhancement of the original value of the record and the documentary ensemble of which it is a part with new cultural, social, etc. meanings acquired because of the passage of time.

- The archival value cannot be definitively established from the beginning of the existence of a record/group of records, but only estimated; this implies subsequent re-evaluations, by analysing new contexts of existence and use, which may lead to the promotion or downgrading of the status of 'historical value'.
- The separation of records with archival value implies that there are records that do not possess this value. Therefore, it should be borne in mind that:
  - the intensity of archival value depends on the degree of uniqueness of the activity and the uniqueness of the information it contains
  - the degree of relevance of records to knowledge is different
  - determining what to keep can also be done by determining what to remove and by analysing the impact of removing certain categories of records.
  - the intensity of the archival value of an records aggregation must also be justified by the logistical resources required for preservation, aligned to the function of the archival preservation institution performing the appraisal.

One can select some filters necessary when performing an appraisal for archival value. Of course, each of them would need more detailed instructions in order to be operational.

1. *Appraisal of the relevance of a creator of records.* Unless it is not specified in their mandates, archival institutions should check which are the most relevant functions and performers of those functions in society, at the time of creating the records.
2. *Which records serves best as the long time testimony on the creators's activity?* That is, the ability of records to provide information on the origin, organisation, functioning of the creator, the functions and activities carried out and their impact on society. This value therefore concerns the processes of records creation and not the actual informational content of the records produced by a creator.
3. *Which is the records informational value?* Information value refers to the information records contain about people, things or phenomena. By the nature of documentary output, records typically contain only information that falls within the remit of the organisation concerned. As a result, information about persons, things or phenomena is not necessarily absolute (complete and objective), but is delimited to the competences and activities of the creator.
4. *Intrinsic value of records.* The intrinsic value of records refers to the meaning that people attribute to a record as an object/artefact or symbol and, as a result, keeping them as originals is the only acceptable form of preservation (as far as possible).
5. *Contextual value.* Contextual value is the long-term importance that certain records can acquire only when specific conditions are met. Examples: rarity of records in a certain timeframe, technical characteristics, relation with other records.
6. *Assessment of the preservation effort.* Preserving some records may involve a disproportionate effort compared to the testimonial/informational value of the records and the possibility of exploitation. It should be explored areas like access and use limitations, preservation/conservation/restauration costs

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*Typology: 1.01 Original scientific research*

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## APPRAISAL OF DIGITAL INFORMATION – SOME CONSIDERATIONS

### Abstract

*Appraisal is part of archival work also concerning digital information. Even though digital storage space is not expensive anymore, it remains still necessary to filter data with an evidence and information value from the digital overload to condense information and to avoid redundancies. In theory, there is no difference between appraisal of analogue records and appraisal of digital records, concerning the information itself. Appraisal of digital records includes technical and organizational appraisal criteria, but these criteria should not influence the appraisal decisions. Upon closer examination, we recognize that technical and organizational requirements have an influence on appraisal work.*

*This paper deals with the question, how digital preservation changes appraisal decisions. Furthermore, it should be discussed if and how the offer of digital documents changed and so does the appraisal work compare with analog documents. Is digital preservation and preservation of digital heritage still in mind of data producers outside the administration? Archivists have to keep all kinds of digital data in mind, which should be part of our digital heritage, from emails to file systems.*

**Key words:** appraisal, records management, archival information management technologies, archival science

## LA VALUTAZIONE DELL'INFORMAZIONE DIGITALE – ALCUNE CONSIDERAZIONI

### Sintesi

*La valutazione fa parte del lavoro d'archivio anche per quanto riguarda l'informazione digitale. Anche se lo spazio di archiviazione digitale non è più costoso, resta comunque necessario filtrare i dati con un valore di evidenza e informazione dal sovraccarico digitale per condensare le informazioni ed evitare ridondanze. In teoria, non c'è differenza tra la valutazione dei record analogici e la valutazione dei record digitali, per quanto riguarda l'informazione stessa. La valutazione delle registrazioni digitali include criteri di valutazione tecnici e organizzativi, ma questi criteri non dovrebbero influenzare le decisioni di valutazione. A un esame più attento, riconosciamo che i requisiti tecnici e organizzativi hanno un'influenza sul lavoro di valutazione. Questo documento affronta la domanda, come la conservazione digitale può prendere decisioni di valutazione. Inoltre, dovrebbe essere discusso se e come è cambiata l'offerta di documenti digitali e così il lavoro di valutazione si confronta con i documenti analogici. La conservazione digitale e la conservazione del patrimonio digitale sono ancora in mente ai produttori di dati esterni all'amministrazione? Gli archivisti devono tenere a mente tutti i tipi di dati digitali, che dovrebbero far parte del nostro patrimonio digitale, dalle e-mail ai file system. Parole chiave: valutazione, gestione dei record, tecnologie di gestione delle informazioni archivistiche, scienza archivistica*

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## VREDNOTENJE DIGITALNIH INFORMACIJ – NEKAJ PREMISLEKOV

### **Povzetek**

*Vrednotenje predstavlja del arhivskega dela tudi pri digitalnih informacijah. Čeprav prostor za digitalno shranjevanje ni več drag, je še vedno potrebno filtrirati podatke z dokazno in informacijsko vrednostjo pred digitalno preobremenitvijo, da z gostimo informacije in se izognemo redundancam. Kar zadeva informacijo samo, teoretično ni razlike med vrednotenjem. Vrednotenje digitalnih zapisov vključuje tehnične in organizacijske kriterije, vendar ti ne smejo vplivati na odločitve o vrednotenju. Ob natančnejšem pregledu ugotovimo, da tehnične in organizacijske zahteve vplivajo na vrednotenje.*

*Ta članek se ukvarja z vprašanjem, kako digitalna hramba vpliva na odločitve pri vrednotenju. Nadalje je potrebno razpravljati o tem, ali in kako se je spremenila ponudba digitalnih dokumentov in primerjava vrednotenja z analognimi dokumenti. Ali digitalno hrambo in ohranjanje digitalne dediščine še vedno v mislih ustvarjalcev informacij zunaj uprave? Arhivisti morajo imeti v mislih vse vrste digitalnih podatkov, ki bi morali biti del naše digitalne dediščine, od elektronske pošte do datotečnih sistemov.*

*Ključne besede: vrednotenje, upravljanje dokumentov, tehnologije upravljanja arhivskih informacij, arhivistika*

## **EINLEITUNG**

Bewertung wird auch in der Zeit der digitalen Informationen nicht obsolet. Auch wenn mittlerweile günstiger Speicherplatz zur Verfügung steht, gilt es, aus der Flut an digitalen Informationen jene mit Evidenz- und Informationswert zu extrahieren, Informationen zu verdichten und Redundanzen zu vermeiden. Denn „Archivierung ohne Bewertung schafft Menge; Archivierung mit Bewertung schafft Wissen“ (Maissen, 2009).

In der Theorie gibt es keinen Unterschied in der inhaltlichen Bewertung von analogen und digitalen Unterlagen. Die inhaltliche Komponente wird zwar durch technisch-organisatorische Bewertungskriterien ergänzt, diese sollten aber die Bewertungsentscheidungen nicht beeinflussen. Bei genauerer Betrachtung muss man aber erkennen, dass technische und organisatorische Vorgaben dennoch Einfluss nehmen auf die Bewertungsentscheidungen.

Der Beitrag beschäftigt sich mit der Frage, inwiefern digitale Archivierung die Bewertungsentscheidung beeinflusst. Darüber hinaus wird hinterfragt, ob sich das Angebot zur Bewertung und Übernahme von digitalen Daten im Vergleich zu den analogen Unterlagen verändert hat. Eine grundsätzliche Fragestellung lautet, ob die Archivierung des digitalen Erbes bei den Datenproduzenten innerhalb, aber vor allem außerhalb der Verwaltung, als Aufgabe präsent ist. Seitens der Archive gilt es, den Überblick über die entstehenden und damit zu bewertenden Unterlagen zu behalten. Als Konsequenz dieser Überlegungen ergibt sich ein Handlungsbedarf bei Archivarinnen und Archivaren.

## **BEWERTUNG DIGITALER VERWALTUNGSUNTERLAGEN**

Digitale Unterlagen erfordern bereits frühzeitig die Aufmerksamkeit der Archive. Neben der Sicherung der Datenqualität verschiebt sich der Bewertungszeitpunkt von der retrospektiven hin zur prospektiven Bewertung. Klare Records Management Richtlinien sind sowohl für die analoge und im Besonderen für die digitale Aktenführung in Behörden notwendig. Sie garantieren die Authentizität, Verlässlichkeit, Vollständigkeit, Integrität, Gesetzmäßigkeit und Interpretierbarkeit der Informationen (ISO, 2016; Schmidgall et al., 2018, pp. 157–159). Records Management ist eine Organisationsaufgabe der Verwaltung. Wenn sich Archivar\*innen an dieser Aufgabe beteiligen dürfen, erleichtert dies in der Regel die Qualitätssicherung und den Weg der Archivierung digitaler Daten.

Der Einführung der digitalen Aktenführung in der Verwaltung ging meist eine Verwaltungsreform voraus. Kleinteilige Aktengruppen wurden häufig durch größere Sachgebiete (Materien) ersetzt. Die Bewertungsarbeit setzt bei diesen Sachgebieten an. Im günstigsten Fall wird dem elektronischen Akt die Bewertungsentscheidung bereits hinterlegt, sodass zum Zeitpunkt der Übergabe an das Archiv nur mehr archivwürdige Unterlagen angeboten werden müssen (Schögggl-Ernst, 2020, pp. 112–120).

Die Bewertung auf der Ebene der Sachgebiete bedeutet sehr oft eine geänderte Bewertungspraxis. Wie sich das am Beispiel einer Reihe von Landesverwaltungen in Österreich zeigt, waren vor der Verwaltungsreform Akten in kleineren Aktengruppen (Aktenplanabschnitten) organisiert. Damit fielen Bewertungsentscheidungen präziser aus, als dies bei den großen Sachgebieten möglich ist. Denn, auch wenn es nun eine Reihe von nicht archivwürdigen Akten innerhalb eines Sachgebietes gibt und nur ein Teil des Sachgebietes archivwürdig ist, wird der Inhalt des gesamten Sachgebietes als archivwürdig klassifiziert. Eine präzisere Bewertung auf Aktenebene soll zwar nach der Übernahme in ein digitales Archiv möglich sein, doch wird wohl der Arbeitsaufwand für eine Nachbewertung zu groß sein. Als Konsequenz daraus ergibt sich, dass eine größere Menge von nicht archivwürdigen digitalen Daten in das digitale Archiv übernommen

wird und auch von den Archivar\*innen in der Folge weiter erschlossen werden muss. Eine organisatorisch-technische Vorgabe beeinflusst in diesem Fall die Bewertungsentscheidung.

## BEWERTUNG VON FACHANWENDUNGEN

In vielen Bereichen der Verwaltung, in denen früher Akten gebildet wurden, werden seit Beginn der Digitalisierung Fachanwendungen geführt. Lediglich die Ergebnisse einer Verarbeitung fließen bestenfalls in den elektronischen Akt ein. In Österreich ist die Aktenführung noch fester verankert als dies in anderen Ländern oder außerhalb der Verwaltung der Fall ist. Im Vergleich mit dem elektronischen Akt wurde der Bewertung von Fachanwendungen in Österreich bisher weniger Aufmerksamkeit geschenkt. Auch seitens der Anwender gerät das Bewusstsein für die Archivierung von Fachanwendungen ins Hintertreffen. Dies birgt die Gefahr eines Datenverlustes, vor allem dann, wenn ein Systemwechsel erfolgt und im Zuge dessen Altdaten gelöscht werden. Die Gefahr des Löschens von Daten besteht auch dann, wenn die stetig steigende Datenmenge die Funktionalitäten einer Datenbank verlangsamen. Die Bewertung von Fachanwendungen ist damit zu einer dringlichen Aufgabe der Archive geworden (Dässler & Schwarz, 2012).

Fachanwendungen werden nach ihrem Inhalt und ihrer Funktionalität bewertet. Dabei zeigt sich, dass nur ein geringer Prozentsatz aller Fachanwendungen archivwürdig ist. So waren beispielsweise in der Verwaltung des Landes Vorarlberg 2020 470 verschiedene Fachanwendungen im Einsatz, von denen nur 15 – also nur drei Prozent – als archivwürdig eingestuft wurden. In der Landesverwaltung Tirol wurden im Jahr 2020 433 Fachanwendungen betrieben. Mindestens 80 Prozent davon gelten als nicht archivwürdig. Von den restlichen 20 Prozent werden nur Samples übernommen. Nur wenige Fachanwendungen wurden als vollständig archivwürdig bewertet. In Bayern werden im Vergleich dazu etwa zehn Prozent der Fachanwendungen als archivwürdig bewertet (Schmalzl, 2020, pp. 130). Die meisten archivwürdigen Fachanwendungen sind in diesen Fällen in ihrer Gesamtheit zu übernehmen. Die Bewertungsentscheidung erfolgt grundsätzlich nach inhaltlichen Kriterien, und zwar auch dann, wenn nur Samples ausgewählt werden, die repräsentativ für die Gesamtheit der in der Datenbank erfassten Entitäten gelten (Verband deutscher Archivarinnen und Archivare, 2014).

Die österreichische Justiz führt seit 1986 ein Fachinformationssystem mit dem Namen „Verfahrensautomation Justiz“ (VJ), welches die Indizes und Register verschiedener Abteilung abgelöst hat, aber auch zum Datenaustausch zwischen den einzelnen Gerichten dient. Mittlerweile hat sich die VJ zur größten IT-Applikation im österreichischen Justizwesen entwickelt, mit welchem mehr als 60 Verfahrensarten, etwa 120 Millionen Akten und über 90 Millionen Urkunden verwaltet werden. Obwohl mittlerweile bereits Dokumente angefügt werden, handelt es sich bei der VJ um keinen elektronischen Akt, sondern im Wesentlichen um eine Verarbeitung von Metadaten, also um ein Datenmanagementsystem (Fröhlich, 2020, pp. 82–83). Den österreichischen Landesarchiven sowie dem Staatsarchiv wurde nach längeren Verhandlungen Zugriff auf diese Daten gewährt, da die Archive eine Übernahme von analogen Akten ohne Findbehelfe verständlicherweise ablehnten. Diese Fachanwendung wird als solche keiner Bewertung unterzogen, sondern dient neben der Funktion als digitaler Findbehelf auch als Modul für die Bewertung von Justizakten. Die Anwendung ist zwar nicht so praktisch wie das deutsche Beispiel „Selesta“ (Koch et al., 2017, pp. 173–177), da es sich dabei nur um den Abzug der Metadaten aus dem Fachinformationssystem handelt, aber nicht um ein zusätzliches Bewertungstool. Dennoch wird es als praktisches Recherchetool dienen und damit auch Abfragen für die Bewertungsarbeit ermöglichen.

Wie bei allen anderen Anwendungen wäre auch bei der VJ eine ständige Überprüfung der Metadatenqualität erforderlich. Auch hier zeigt sich Handlungsbedarf. Denn die Felder werden teilweise nicht nach den Vorgaben befüllt, was eine Auswertung der Daten erschwert.

## **BEWERTUNG VON DIGITALEN ABLAGEN**

Während die Bewertung der digitalen Aktenführung in Österreich bereits umgesetzt wurde oder zumindest im Fokus der Archive ist, schiebt man die Bewertung und Archivierung von Daten in Ordnersystemen noch vor sich her. Die Ablage von digitalen Daten auf verschiedenen Speichermedien wird schon viel länger als die digitale Aktenverwaltung durchgeführt. Dass es mittlerweile aufgrund der mangelnden Wartung und generell der fehlenden Beachtung dieser Daten zu Datenverlust gekommen ist, davon kann man ausgehen. Das Problembewusstsein ist zwar vorhanden, diese Daten wurden aber aus verschiedenen Gründen bisher nicht beachtet. Zum einen liegt bei vielen Archiv\*innen der Fokus auf den analogen Daten. Der Grund dafür liegt in der laufenden Bewertung und Übernahme von weiterhin analogen Unterlagen. Die gleichzeitig entstandenen digitalen Daten werden in den Hintergrund gedrängt. Daten in Ordnersystemen der Verwaltung könnte man mit den analogen Handakten gleichsetzen. In den meisten österreichischen Archiven gibt es noch keine Lösung für die Archivierung unstrukturierter digitaler Daten. Eine Lösung wird aber auch nur zögerlich gesucht. Einerseits beruft man sich in großen Verwaltungsarchiven auf die vorgeschriebene Veraktung wichtiger Daten im digitalen Akt. Damit werden die daneben existierenden Datenablagen kurzerhand als nicht archivwürdig erklärt. Andererseits sind die Mitarbeiter\*innen von Verwaltungsbehörden aufgefordert, ihre Daten selbst zu verwalten und im Falle des Ausscheidens aus der Verwaltung zu löschen. Die Daten aller Verwaltungsbediensteten gelten mit Sicherheit nicht als archivwürdig. Man müsste sich aber die Zuständigkeitsbereiche dieser Personengruppen näher ansehen sowie auch den Grad der Veraktung, um eine generelle Skartierung vorgeben zu können. Schwerwiegender wird die Bewertungsfrage bei hohen Beamten, bei politischen Entscheidungsträgern und Personen des öffentlichen Lebens. Die von dieser Personengruppen in ihren jeweiligen Funktionen abgelegten digitalen Daten sollten jedenfalls einer Bewertung durch Archiv\*innen unterzogen werden, natürlich noch bevor ein Löschungsauftrag erfolgt ist. Die Bewertung dürfte hier keinesfalls den Personen selbst überlassen werden.

Neben den digitalen Ablagen in der Verwaltung wurden und werden ungleich mehr Daten im wirtschaftlichen und im privaten Bereich produziert. Davon sind auch Verwaltungsarchive betroffen, denn sie übernahmen schon seit jeher im disponiblen Bereich Nachlässe, Sammlungen und Archive von juristischen Personen (Firmenarchive, Vereinsarchive). Wenn sie dies weiterhin tun wollen, müssen sie sich künftig mit digitalen Daten in Ordnersystemen auseinandersetzen. Um ein Bild der Gesellschaft einer bestimmten Zeit abbilden zu können, wie es in den Zielen der Überlieferungsbildung von Archiven zum Ausdruck gebracht wird, muss das Augenmerk auch auf den nicht-amtlichen Bereich gelegt werden. Denn verschiedene Aufgaben wurden in den letzten Jahren von der Verwaltung in die Zuständigkeit verschiedener Organisationen gelegt, die keine amtliche Aktenverwaltung führen.

Bevor eine Bewertungsentscheidung getroffen werden kann, muss festgestellt werden, ob die digitalen Daten archivfähig sind. Die Datenformate müssen für eine Ablage im Langzeitarchiv geeignet sein, und die Datenqualität den geltenden Normen entsprechen. Außerdem muss überprüft werden, welche Metadaten vorhanden sind. Für die Analyse der digitalen Metadaten gibt es elektronische Werkzeuge, die Autor,

Format, Erstelldatum und weitere Dateiattribute filtern. Damit können temporäre Dateien und Doubletten ermittelt und in der Folge gelöscht werden. Semantische Methoden sind in Entwicklung begriffen. Sie ermöglichen inhaltliche Analysen. Sind grundsätzlich nicht genügend Metadaten zu erfassen, kann dies bereits ein Bewertungskriterium darstellen.

Bei Daten, die in Ordnersystemen abgelegt sind, fehlen oft die Zusammenhänge, die Einordnung in einen Kommunikationsbereich und damit der Entstehungszusammenhang. Damit geht auch der Evidenzwert der Daten verloren, denn der Weg zu einem Ergebnis und die Arbeitsweise einer Stelle sind aus den Fileablagen kaum ersichtlich. Bewertungsmethoden, die für strukturierte Verwaltungsakten angewandt werden können, wie beispielsweise die Listenbewertung, sind bei Fileablagen nicht möglich. Bewertungsentscheidungen können daher nur über die Person oder die Stelle getroffen werden, die diese Daten angelegt hat, jedoch nicht anhand der Daten selbst. Die Bewertung setzt demnach bei der Analyse des Provenienzbildners an. Dazu zählt seine Einordnung innerhalb einer Behörde, sein Zuständigkeitsbereich und das Aufgabengebiet, im Falle einer Person, ihre Biografie und die Stellung innerhalb der Gesellschaft. Daraus lässt sich die Bedeutung der Stelle oder der Person ableiten, was aber noch nicht zwingend eine entsprechende inhaltliche Aussagekraft der vorhandenen Daten inkludiert (Bacia et al., 2021, pp. 15–26).

## NACHLÄSSE

Zu den Beständen mit wenig strukturierten digitalen Daten zählen die Nachlässe. Erfahrungen mit der Bewertung und Übernahme digitaler Nachlässe kennen wir aus den USA – hier beschäftigen sich vorrangig Bibliotheken, wie die Library of Congress mit digitalen Nachlässen –, aber auch aus anderen Ländern. Die praktischen Erfahrungen bei der Übernahme dieser Bestände haben einige Problemfelder zutage gebracht. Man ist mit schlecht oder gering strukturierten Daten konfrontiert, mit mehrfach vorhandenen Informationen, bei denen die Dateien nur anders benannt worden sind, mit nicht archivtauglichen Formaten, mit nicht validen Daten, mit einem Wirrwarr von Entwürfen und Endfassungen, die nur schwer voneinander unterschieden werden können, und mit einer großen Datenmenge, in der Programme und Systemdaten sowie Dateien ohne Informationsgehalt integriert sind. Während man bei analogen Nachlässen eine retrospektive Bewertung durchführen konnte und sich die Bewertung nach dem vorgefundenen Inhalt richtete, ist diese Vorgangsweise bei digitalen Nachlässen aufgrund der Datenmenge nicht durchführbar. Der inhaltlichen Bewertung geht eine technische Bewertung voraus, im Rahmen derer doppelte Dateien, Programme und Systemdateien bereits erkannt und eliminiert werden. Dadurch reduziert sich die zu bewertende Datenmenge. Gaby Pfyffer hat für digitale Nachlässe eine Strategie zur Überlieferungsbildung erarbeitet, die in einer Empfehlung mündete. Sie geht davon aus, dass man mit den potentiellen Nachlassgebern im Vorfeld in Kontakt treten muss, um Einfluss zu nehmen auf die Strukturierung der Daten und auf die Datenqualität, damit das Archiv archivfähige Daten übernehmen kann. Auch für die inhaltliche Bewertung ist der frühe Kontakt mit dem Überlieferungsbildner von Bedeutung. Denn in gemeinsamer Arbeit kann eine Checkliste, die zuvor vom Archivar erstellt wurde, abgearbeitet werden. Damit werden im Vorfeld inhaltliche Weichen gestellt und organisatorisch-technische Probleme vermieden oder zumindest verringert (Pfyffer, 2020). Wenn Archive eine überschaubare Gruppe von Vorlass- bzw. Nachlassbildnern im Auge haben, ist eine solche Zusammenarbeit wünschenswert und durchführbar. Doch die meisten Nachlässe erreichen die Archive erst eben nach dem Tod des Provenienzbildners. Dies erschwert natürlich die Einflussmöglichkeiten auf die Datenordnung und -qualität. Dennoch könnte

eine öffentlich zugängliche und offensiv propagierte Checkliste für digitale Nachlässe zu mehr Kooperation mit potentiellen Provenienzbildnern führen und damit die Datenqualität erhöhen.

## E-MAILS

Seit Jahren verdrängt der Mailverkehr den analogen Brief; Korrespondenzen werden zu einem erheblichen Teil nur mehr über Email geführt. 2020 wurden weltweit rund 306 Milliarden E-Mails versandt (Benauer, 2020, pp. 87). Angesichts dieser Zahl liegt die Feststellung nahe, dass dieses Medium zu einem bestimmenden Faktor in der internationalen Kommunikation geworden ist. Dass solche Mengen nicht archiviert werden können und auch nur teilweise archivwürdig sind, ist evident. Zur Bewertung und Archivierung von Emails gibt es bereits Best-Practice-Beispiele, wenn diese auch nicht in Österreich zu finden sind.

E-Mails, die in der Verwaltung in den elektronischen Akt einfließen, unterliegen den Bewertungskriterien des elektronischen Aktes. Die österreichische Verwaltung blickt auf eine lange Tradition zurück, die auch im elektronischen Akt in einer ähnlichen Form weitergeführt wird. Dies trifft aber nicht auf alle Bereiche zu.

Häufig passiert digitales Verwaltungshandeln ohne den Einsatz eines elektronischen Aktes, der dem analogen Akt nachgebildet ist. In der Bewertung dieser Daten müssen daher andere Strategien angewandt werden. Einen funktionalen Bewertungsansatz verfolgen die USA mit dem „Capstone Approach“ (Benauer, 2020, pp. 104f.). Dabei werden Entscheidungsträger innerhalb der Verwaltung ermittelt, deren E-Mail-Accounts als archivwürdig bewertet werden. Allerdings ist nicht gewährleistet, dass bei diesem Personenkreis auch die aussagekräftigsten Inhalte überliefert werden.

Eine Einzelbewertung von E-Mails muss aufgrund der Menge verworfen werden. Ein weiterer Ansatz, eine aussagekräftige Teilmenge an E-Mails herauszufiltern geschieht mit Hilfe von Algorithmen, die nach bestimmten Vorgaben eine repräsentative Auswahl treffen. Die Schnittmenge, die daraus gebildet wird, muss nach Kriterien, die von den Archivar\*innen festzulegen sind, ermittelt werden. Dass die Kriterien in gewissem Sinn subjektiven Charakter aufweisen, kann nicht vermieden werden, da schlussendlich immer menschliches Handeln hinter den Kriterien steckt. Theoretische Abhandlungen und praktische Umsetzungen existieren bereits. In Österreich müssen sich die Archivar\*innen dieses Problems nur zeitnah annehmen, um allzu große Datenverluste zu vermeiden.

## INTRANET, SHAREPOINT

Beispiele der Internetarchivierung kennen wir bereits. Webseiten werden hauptsächlich von Bibliotheken archiviert. Die Österreichische Nationalbibliothek archiviert bereits seit 2009 Websites (Predikaka, 2020). Auch in anderen Ländern haben sich Bibliotheken der Web-Archivierung angenommen; die Deutsche Nationalbibliothek betreibt ebenso Web-Archivierung wie etwa die Luxemburgische Nationalbibliothek, die Französische Nationalbibliothek oder die British Library, um nur diese Beispiele zu nennen. Aber auch Archive sind mit der Aufgabe der Web-Archivierung betraut. So feiern die National Archives im November 2021 25 Jahre UK Government Web Archives (Web Archiving Team at The National Archives, 2021). Die Bewertungsgrundlagen bilden einerseits die Auswahl der zu archivierenden Domains, es werden aber auch inhaltliche Sammlungsziele festgehalten und verfolgt mit thematischen und eventbezogenen Schwerpunkten.

Verwaltungen und Firmen kommunizieren mit ihren Mitarbeiter\*innen häufig über das Medium des Intranets. Erlässe und andere rechtliche Regelungen, Personalangelegenheiten und IT-Maßnahmen werden über das Intranet verbreitet. Wichtige Projekte werden auf Sharepoints dokumentiert, wobei die Projektabwicklung über dieses Medium



nachvollzogen werden kann, die Projektergebnisse in der Regel veraktet werden. Der Akt bildet allerdings den Prozess der Entscheidungsfindung nicht mehr ab, wodurch wichtige Informationen verloren gehen. Der Bewertung und Archivierung beider Plattformen wurde bisher nur wenig Aufmerksamkeit geschenkt.

Es gibt bereits Beispiele für Intranetarchivierung durch Archive. So sehen die Thüringer Staatsarchive dies als eine ihrer Aufgaben und haben die Anbietung und Übernahme von Intranetseiten in ihren „Empfehlungen zur Anbietung und Übergabe elektronischer Unterlagen an die Thüringischen Staatsarchive“ festgehalten (Landesarchiv Thüringen, 2013). Antje Schlieter lieferte bereits 2003 ein Konzept für die Archivierung des Intranets der Dresdener Bank AG, mit dem das Historische Archiv der Bank beauftragt wurde (Schlieter, 2003).

Die Archivierung und Bewertung von Daten aus den verschiedenen sozialen Medien ist ein weites Feld, mit dem sich die Archivwissenschaft bereits auseinandersetzt, das an dieser Stelle aber nicht weiter erörtert werden soll.

## ZUSAMMENFASSUNG

Die Bewertung digitaler Daten sollte in optimaler Form prospektiv erfolgen. Für den digitalen Akt gibt es in Österreich bereits Beispiele. Die österreichische Verwaltung blickt auf eine lange Verwaltungstradition zurück. Daher werden viele amtliche Vorgänge veraktet. Verschiedene Prozesse werden aber seit Jahren mittels Fachanwendungen verarbeitet. Von denen finden höchstens die Ergebnisse Eingang in den elektronischen Akt. Der Prozess der Entscheidungsfindung geht dadurch verloren, wenn die Fachanwendungen nicht selbst archiviert werden. Archivar\*innen haben diese Fachanwendungen einer Bewertung unterzogen mit dem Ergebnis, dass von deren Inhalten nur ein Anteil von weniger als 20 Prozent archivwürdig ist.

Ein großteils in Österreich noch vernachlässigter Bereich ist die Bewertung unstrukturierter digitaler Ablagen. In der Verwaltung geht man davon aus, dass wichtige Informationen veraktet werden. Wir wissen aber, dass dies nicht durchgehend umgesetzt wird. Daher sollten die digitalen Dateien von Entscheidungsträgern einer Bewertung durch Archivar\*innen unterzogen werden. Für die technische Analyse existieren bereits Tools, die man einsetzen kann.

Nachlässe zählen zum disponiblen Bereich der Verwaltungsarchive. Für die Bewertung von digitalen Nachlässen gibt es bereits Strategien. Damit die Daten grundsätzlich zur Übernahme archivfähig sind, sollte bereits in einer frühen Phase mit den potentiellen Provenienzbildnern Kontakt aufgenommen und auch die Bewertungsrichtlinien kommuniziert werden.

Zu den beliebtesten Kommunikationsmitteln unserer Zeit zählt das E-Mail, das den Briefverkehr weitgehend abgelöst hat. Um die Bewertung von E-Mails außerhalb der Verwaltung hat man sich in Österreich noch nicht bemüht. In Ländern mit einer anderen Verwaltungstradition hat sich die Archivwissenschaft mit diesem Thema bereits auseinandergesetzt. In den USA verfolgt man den Ansatz, die E-Mail-Accounts von Entscheidungsträgern zu archivieren. Einen anderen Weg geht man mit der Ermittlung von archivwürdigen Themen, aus denen mit Einsatz von Algorithmen Schnittmengen ausgewählt werden.

Mit der Bewertung und Archivierung von Internetseiten beschäftigen sich hauptsächlich Bibliotheken. Sharepoint und Intranetseiten werden ebenfalls bereits berücksichtigt. Die Archivwissenschaft beschäftigt sich auch mit den sozialen Medien. Die aktive Bewertung von Daten aus sozialen Medien ist derzeit für österreichische Archive aber noch kein Thema.

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## **Summary**

*The appraisal of digital data should ideally be carried out prospectively. In Austria, we have a long history of administration and best-practice examples for digital records in civil service. Most of the administrative operations were recorded in administration documents. Since many years, administration offices and business enterprises use data management applications. Only the results of such applications become part of the administration documents. As a result, the process of decision-making is lost. Some of the Austrian archivists have evaluated hundreds of data management applications with the result that a rate of three until 20 percent of them are of archival value.*

*Appraisal of digital file systems is largely neglected in Austria because the administration use digital records management systems which includes that all administrative processes should be part of this digital records management system. However, we know that this is not consistently implemented. Therefore, the digital files of decision makers should be subject of evaluation by archivists.*

*Personal papers belong to the disposable area of the administrative archives. Strategies already exist for valuing digital personal papers. We have to get in contact with the creators of provenance much earlier to get digital data which are in an archivable state and to transmit our guidelines for appraisal.*

*For years now, mail traffic has been displacing the analogue letter; correspondence is conducted to a largely extent only by email. Austrian archivists have not dealt with the appraisal of emails. Archivists of the USA keep email accounts of decision makers ("capstone approach"). Another approach to filtering out a meaningful subset of emails is done with the help of algorithms that make a representative selection according to certain specifications.*

*Libraries deal with archiving of webpages. Archival science is also concerned with appraisal and keeping of social media – this is a topic for a further paper.*

*Typology: 1.04 Professional article*

Andrei Rybakou<sup>1</sup>

## APPRAISAL OF ELECTRONIC DOCUMENTS: CRITERIA AND STAGES

### ABSTRACT

*The article is devoted to special features of appraisal of electronic documents and special criteria that should be applied in the process of selecting documents for transferring to the archive. The author concludes that most of the criteria used in the process of the appraisal are traditional and equally applicable to both paper and electronic documents. At the same time, when evaluating electronic documents, a number of special criteria should be applied, such as the availability of the necessary metadata, the ability to reproduce and process electronic documents without using additional specialized software throughout the entire period of their storage, etc. The presence of special criteria determines certain stages in the process of appraisal, that should start from the stage of the design of the information system, in which electronic records will be created, circulated and stored.*

**Key words:** *electronic document, information resource, information system, appraisal, criteria for the appraisal and selection of documents, stages of the appraisal*

## VALUTAZIONE DEI DOCUMENTI ELETTRONICI: CRITERI E FASI

### ABSTRACT

*L'articolo è dedicato alle particolarità della valutazione dei documenti elettronici e ai criteri particolari che dovrebbero essere applicati nel processo di selezione dei documenti da trasferire all'archivio. L'autore conclude che la maggior parte dei criteri utilizzati nel processo di valutazione sono tradizionali e ugualmente applicabili sia ai documenti cartacei che a quelli elettronici. Allo stesso tempo, quando si valutano i documenti elettronici, dovrebbero essere applicati una serie di criteri speciali, come la disponibilità dei metadati necessari, la capacità di riprodurre ed elaborare documenti elettronici senza utilizzare software specializzato aggiuntivo durante l'intero periodo della loro conservazione, ecc. La presenza di particolari criteri determina alcune fasi del processo di valutazione, che dovrebbe partire dalla fase di progettazione del sistema informativo, in cui verranno create, diffuse e conservate le registrazioni elettroniche.*

**Parole chiave:** *documento elettronico, risorsa informativa, sistema informativo, valutazione, criteri per la valutazione e selezione dei documenti, fasi della valutazione*

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## VREDNOTENJE ELEKTRONSKEGA GRADIVA: KRITERIJI IN STOPNJE

### Povzetek

Članek je posvečen posebnostim vrednotenja elektronskih dokumentov in posebnim merilom, ki jih je treba upoštevati pri izbiri dokumentov za predajo v arhiv. Avtor ugotavlja, da je večina kriterijev, uporabljenih v procesu vrednotenja, tradicionalnih in enako uporabnih tako za papirne kot elektronske dokumente. Hkrati je treba pri vrednotenju elektronskih dokumentov uporabiti številna posebna merila, kot so razpoložljivost potrebnih metapodatkov, zmožnost reprodukcije in obdelave elektronskih dokumentov brez uporabe dodatne specializirane programske opreme skozi celotno obdobje njihovega shranjevanja itd. Prisotnost posebnih kriterijev določa določene faze v procesu vrednotenja, ki se mora začeti v fazi načrtovanja informacijskega sistema, v katerem se bodo ustvarjali, krožili in hranili elektronski zapisi.

**Ključne besede:** elektronski dokument, informacijski vir, informacijski sistem, vrednotenje, merila za vrednotenje in izbor dokumentov, stopnje vrednotenja

## ЭКСПЕРТЫЗА КАШТОЎНАСЦІ ЭЛЕКТРОННЫХ ДАКУМЕНТАЎ: КРЫТЭРЫІ І ЭТАПЫ

### РЭЗЮМЭ

У артыкуле разглядаюцца асаблівасці правядзення экспертызы каштоўнасці электронных дакументаў і спецыяльныя крытэрыі, якія павінны выкарыстоўвацца ў працэсе адбору дакументаў для перадачы на захоўванне ў архіў. Аўтар робіць выснову, што большасць крытэрыяў, якія ўжываюцца пры ацэнцы, з'яўляюцца традыцыйнымі і аднолькава падыходзяць як да папяровых, так і да электронных дакументаў. У той жа час пры экспертызе электронных дакументаў павінен прымяняцца шэраг спецыяльных крытэрыяў, такіх як, наяўнасць неабходных метададзеных, магчымасць узнаўлення і апрацоўкі электронных дакументаў без выкарыстання дадатковага спецыялізаванага праграмнага забеспячэння на працягу ўсяго тэрміну іх захоўвання і інш. Наяўнасць спецыяльных крытэрыяў абумоўлівае пэўную этапнасць пры правядзенні ацэнкі, якая павінна пачынацца на этапе праектавання інфармацыйнай сістэмы, у якой электронныя дакументы будуць стварацца, абарочвацца і захоўвацца.

**Ключавыя словы:** электронны дакумент, інфармацыйны рэсурс, інфармацыйная сістэма, экспертыза каштоўнасці, крытэрыі ацэнкі і адбору дакументаў, этапы правядзення экспертызы каштоўнасці

## 1 INTRODUCTION

Issues related to the appraisal of documents and their selection for storage in the archive are among the most difficult and debatable in records management and archival science. When solving relevant problems, scientists and practitioners proceed from the goal of ensuring the future needs of the state, society and a person in retrospective documented information.

The difficulty lies in the fact that any document from the moment of its creation has a certain information potential and in the future may be demanded as a historical source (Илюшенко, 1973; Илюшенко, 1999; Илюшенко, 2000). Indeed, it is unlikely that the ancient Sumerians or Egyptians could suspect that the records they had made on clay tablets or papyrus scrolls, which in many cases had a purely utilitarian character, would be considered as the most valuable historical sources in the distant future.

Equally obvious is the fact that it is impossible from a practical point of view to preserve all documents generated in the activities of state, private, public organizations and individuals, since it requires colossal costs. This contradiction can be resolved by selecting documents with the greatest source potential for their subsequent transfer to permanent storage in the archive. However, it is not so easy to identify preliminary the degree of demand for the information potential of this or that document in the future and its ability to be used as a historical source. Initially, documents are created for different purposes and are designed to solve specific practical problems (management, accounting, social security, legal regulation, etc.). But none of them is created for archival storage for purposes of its future usage in historical research.

In these conditions, the records managers and archivists have to develop certain approaches to the appraisal of documents, to develop special principles and criteria, the application of which will ensure the selection and storage of the most valuable documented information in the archives, comprehensively and most fully revealing various aspects of political, economic, social, cultural life of society of a particular historical period.

The use of electronic records, the implementation of special information systems in the field of records and archives management, specially designed for their creation and storage, significantly actualize the above mentioned task. The specific nature of an electronic document requires a revision of the traditional approaches to the appraisal, the search for special criteria for the selection of electronic documents for permanent storage in archives. The task of appraisal and selecting electronic documents is significantly complicated by the fact that modern technical and software tools allow to create and store huge and constantly increasing volumes of documented information.

In turn, the possibility of storing large amounts of information on fairly compact media makes one think about the expediency of appraisal of electronic documents or, at least, their individual complexes. An electronic document is created and exists in a certain information system, so the idea of transferring to archive a full set of documents generated during the operation of this system looks very tempting. This approach seems to be the most promising in relation to documented information that is contained in information resources as their part (databases, data banks, etc.). In the world archival community more and more information appears that in a particular country a full range of digital information formed as part of one or another information resource has been accepted for archival storage. At the same time, in order to search for the required information as part of the "big data" accepted for archival storage, more and more hopes are pinned on "artificial intelligence".

Nevertheless, even if we agree that the entire content of all information resources has an enduring scientific and historical significance, it should be recognized that the preservation of absolutely the entire information massive of all information resources is hardly possible from a practical point of view. In the future, the accumulation of colossal volumes of information in archives will require the attraction of considerable and constantly increasing material and labor costs to maintain resources in working order. It should be remembered that any information system earlier or later will be decommissioned. Over time, it will be necessary to convert the information of databases into new information objects, its migration to other information systems, which will lead to the loss of identity, and in some cases – the authenticity of archival information. In these conditions, archivists will have to take responsibility for the correspondence of the changed information to its original state, take on the function of confirming this correspondence, and this additional responsibility and function of archivists can hardly be considered as good idea (Rybakou, 2020). In any case, archivists still have to solve the problem of long-term preservation of information resources.

The indisputable fact is that as the volume of digital information increases, the costs of its long-term preservation, ensuring its authenticity and availability for use will increase. It is known that storage of electronic documents initially has an advantage over the storage of their paper counterparts from the point of view of expenditure. However, already at the stage of operative storage, this advantage begins to disappear as the volume of documentation increases and software becomes obsolete. When organizing long-term archival storage of electronic documents, due to the above mentioned reasons, the costs increase many times over.

The possibilities of using “artificial intelligence” to search for the necessary archival information in the context of “big data” also seem to be very limited. Without systematization and proper archival description of documented information, the organization of its effective search becomes more and more difficult.

Thus, the need for an appraisal of electronic documents is obvious. It is also obvious that in the appraisal and selection of electronic documents for transfer to the archives, some general universal criteria will be applied, equally suitable for the appraisal of documents, regardless of the type of their medium and the form of their presentation. At the same time, the appraisal of electronic documents requires to use a number of special criteria, special methods that take into account the specifics of their creation and existence both at the stage of operational circulation and at the stage of archival storage. Let’s consider approaches to solving these problems using the Belarusian example.

## **2. GENERAL PRINCIPLES AND CRITERIA FOR APPRAISAL. SPECIAL CRITERIA FOR THE APPRAISAL OF SCIENTIFIC, TECHNICAL AND AUDIOVISUAL DOCUMENTATION**

The principles and criteria for the appraisal of documents, which are now guided by Belarusian archivists, generally correspond to the principles and criteria developed by the Soviet archival school in the 1960s-70s. The greatest contribution to the development of the system of criteria, applied with some changes to this day, was made by Vsevolod Tsaplin, who also proposed a generally recognized classification of criteria into groups (Черешня, 2004; Цаплин, 1966; Цаплин, 1974).

The principles and criteria for the appraisal applied today are enshrined in the Rules of Work for the Archives of State Bodies and Other Organizations (Постановление Министерства юстиции Республики Беларусь от 24 мая 2012 г. № 143 «Об утверждении

Правил работы архивов государственных органов и иных организаций», 2012, chapt. 7). The Rules is the act of legislation and all state bodies, as well as state, private and public organizations are obliged to use it when appraising the documents created in their activities and establishing the terms of their storage and their selection for archival storage.

The Rules stipulates that the appraisal of documents should be based on the principles of historicism, complexity and comprehensiveness.

The principle of historicism presupposes an assessment of the content of documents based on the historical situation in which the organization, in whose activities the documents were formed, (organization the "fond-creator") operated.

The principle of complexity assumes the appraisal of documents, taking into account their place and significance in the composition of the existing set of documents (fond) in the organization the fond-creator, as well as their relationship with documents of other fonds.

The principle of comprehensiveness presupposes an appraisal of documents from the point of view of their reflection of various aspects of the material and spiritual life of a person and society.

The applied criteria for the appraisal are classified in the Rules into three groups: origination, content, external features.

The criteria of origination include: the role and place of the organization in the system of public administration and (or) a particular economy sector, the significance of the functions it performs; the role and importance of an individual in government activities and other areas of public life, in the development of science, culture; time and place when and where the document was created.

The criteria of content include: the significance of the event reflected in the document; the value of the information contained in the document; repeatability of document information in other documents; name and type of the document.

The criteria of external features of the document are: the authenticity of the document and its legal reliability (the presence of signatures, dates, seals); the presence of resolutions, notes; features of the style and text design of the document; features of the material medium of the document; the physical condition of the document.

In addition to the above mentioned universal criteria used in the appraisal of all documents, regardless of their belonging to a particular system of documentation or the type of medium and the form of presentation, when appraising scientific, technical and audiovisual documentation a number of specific criteria, reflecting the specifics of these documents, are applied. These criteria are also enshrined in regulatory legal acts that establish special requirements for working with them.

So, in the process of appraisal of scientific and technical developments, along with general criteria, specific criteria and criteria of public recognition are applied.

Specific criteria are: the significance of scientific and technical documentation for the society and state; the degree of innovation, uniqueness and originality of the solution to the problem in a specific branch of science, technology, construction, production; the cost-effectiveness of the implementation of the results of a research or technical idea; social effectiveness of a research or development; the degree of mechanization and automation of technological processes in building the objects and in manufacturing the industrial products; fundamental nature of scientific researches; the degree of reflection of the level of development of science and technology in a research, project, capital construction object or industrial product, as well as the technology of its manufacture;



the number of standard solutions implemented in building object and industrial production; modification, maximum unification of industrial products, their technical aesthetics, reliability; mass production or serial production; the degree of reconstruction of the building object; national architectural features, specificity of geological and hydrological conditions.

Criteria of public recognition includes: the awarding of international, state or personal prizes to developments; nominating research and development for awards; demonstration of them at international fairs; patent and commercial value, i.e. patenting of developments, purchase of licenses by foreign companies (Постановление Комитета по архивам и делопроизводству при Совете Министров Республики Беларусь от 6 ноября 2003 г. № 38 «Об утверждении Правил работы с научно-технической документацией в организациях Республики Беларусь», 2003, chapt. 20).

Specific criteria for appraisal audiovisual documentation (film, photo, phono and video documents) are systematized into two groups: content and external features.

Specific criteria of content presuppose determining the value of audiovisual documents as works of art. They include: artistic merit of audiovisual documents, compositional and plot integrity, expressiveness and originality of documents.

Specific criteria for the external features of audiovisual documents presuppose taking into account the type of the information medium, the method of recording and reproducing information, the technical condition of documents (Постановление Министерства юстиции Республики Беларусь от 9 апреля 2007 г. № 27 «Об утверждении Правил работы государственных архивов Республики Беларусь с аудиовизуальными документами», 2007, chapt.19).

Naturally, when appraising scientific, technical and audiovisual documentation, the general criteria are applied selectively, taking into account the peculiarities of the content and material basis of these documents.

### **3. SPECIAL CRITERIA FOR APPRAISAL OF ELECTRONIC DOCUMENTS AND INFORMATION RESOURCES. STAGES OF APPRAISAL**

The first attempt of Belarusian archivists to determine special criteria and the procedure for the appraisal of electronic documents dates back to 2005, when the Instruction on the Procedure of Appraisal and Transfer of Electronic Documents and Information Resources to State Storage was adopted (Постановление Комитета по архивам и делопроизводству при Совете Министров Республики Беларусь от 23 марта 2005 г. № 3 «Об утверждении Инструкции по проведению экспертизы ценности и передачи электронных документов и информационных ресурсов на государственное хранение», 2005).

Already in this normative legal act, a provision was formulated according to which the appraisal of electronic documents and information resources should be carried out on the basis of general and specific selection criteria, the list of which was also enshrined in the Instruction.

In 2010 and 2012 as a result of the revision, new instructions were adopted. They did not change the criteria for the appraisal and selection of electronic documents established in 2005 (Постановление Министерства юстиции Республики Беларусь от 30 июня 2010 г. № 37 «Об утверждении Инструкции по проведению экспертизы ценности и передаче на государственное хранение документов в электронном виде и информационных ресурсов и о признании утратившими силу некоторых нормативных правовых актов», 2010; Постановление Министерства юстиции Республики Беларусь от 11 мая 2012 г. № 121 «Об утверждении Инструкции о порядке проведения экспертизы ценности и

передачи на постоянное хранение документов в электронном виде и информационных ресурсов и о признании утратившим силу постановления Министерства юстиции Республики Беларусь от 30 июня 2010 г. № 37», 2012).

A detailed analysis of the above mentioned regulatory legal acts allows us to conclude that most of the proposed general and specific criteria for appraising electronic documents are universal and they can be equally applied to both electronic documents and documents on traditional media.

The validity of this conclusion is clearly illustrated by the list of specific criteria for appraisal of electronic scientific and technical documents, enshrined in the instructions. Among these criteria are listed: patent and license value; significance for the further development of science, technology, production and the national economy in common; fundamental novelty, uniqueness and originality of the research or development; the degree of reflection of the level of science, technology and production in the research or development; economic benefits at the moment of implementation of research results or technical ideas, etc. In fact, the specific criteria for appraisal of electronic scientific and technical documents repeat, literally or in a slightly modified form, the specific criteria for appraisal of scientific and technical documents established in the Rules of Work with Scientific and Technical Documentation in Organizations of the Republic of Belarus, which are universal and are not tied to the type of media of a document (Постановление Комитета по архивам и делопроизводству при Совете Министров Республики Беларусь от 6 ноября 2003 г. № 38 «Об утверждении Правил работы с научно-технической документацией в организациях Республики Беларусь», 2003, chapt. 20).

Moreover, when defining specific criteria for appraisal of electronic managerial documents, the developers of the instructions made a simple reference to the criteria "which are similar to the criteria used for the corresponding paper documents". In this regard, a well-grounded question arises about the specifics of the composition and content of special criteria for appraising precisely electronic documents of this type.

At the same time, the above mentioned instructions also contained a number of criteria designed to emphasize the specifics of the appraisal of electronic documents and information resources. Instructions, adopted in 2005, 2010 and 2012, listed among others the following criteria for appraising electronic documents and information resources: completeness of the parts and elements of an information resource or an electronic document; clarity of information and convenience of its use in comparison with paper counterparts; the ability to ensure permanent preservation of electronic documents; the ability to reproduce and process information without using additional specialized software; compliance with the established forms and procedures to ensure the authenticity and integrity of electronic documents; availability of accompanying documentation for electronic documents and technological documentation for the information system in which the documents were created and existed.

The instructions also established a number of specific criteria for selecting information resources for archival storage: completeness of information resources, that is, the ratio of information contained in the concrete information resource with the total amount of information available in the country for a given class of objects or phenomena; reliability of information; the uniqueness of the information resource, determined by the system of collecting the information, etc.

In 2019, new regulatory legal acts, that established the procedure for working with electronic documents at all stages of their life cycle, were adopted (Постановление Министерства юстиции Республики Беларусь 6 февраля 2019 г. № 19 «Об утверждении Инструкции о порядке работы с электронными документами в государственных органах, иных организациях», 2019; Постановление Министерства юстиции Республики Беларусь 6 февраля 2019 г. № 20 «Об утверждении Правил работы с документами в электронном виде в архивах государственных органов, иных организаций», 2019). It is fundamentally important that they have established certain stages of selection and transfer of electronic documents for storage in state archives. These stages to some extent coincides with the stages of selection and transfer of paper documents to archives, and these procedures starts at the stage preceding the creation of the document (Rybakou, 2019).

Special criteria for appraising electronic documents and information resources were not included in the regulatory legal acts. Therefore, on the basis of the accumulated experience, it was decided to develop separate methodological recommendations (guidelines), devoted to this issue (Методические рекомендации по проведению экспертизы ценности документов в электронном виде, электронных документов и информационных ресурсов в государственных органах, иных организациях, 2020).

Methodological recommendations for the appraisal of documents in electronic form, electronic documents and information resources in government bodies, other organizations have established general and special criteria for assessing the relevant documents and resources. It should be noticed, that according to the Law of the Republic of Belarus "On Electronic Document and Electronic Digital Signature", an electronic document is considered as a document in electronic form with elements (attributes) that allow to establish its integrity and authenticity, which are confirmed by using certified electronic digital signature of the organization or individual (persons) who signed this electronic document (Закон Республики Беларусь от 28 декабря 2009 г. «Об электронном документе и электронной цифровой подписи», 2009). Legislation in the field of archival work and records management provides for the possibility of creating, circulating and storing both the actual electronic documents and documents in electronic form, therefore, to refer to all these documents, we will further use the single concept of "electronic document".

Despite of the attempt to rethink the list and content of general and special criteria for appraising electronic documents and information resources, the authors of the guidelines could not avoid the methodological error inherent in the previously valid instructions on this issue. In particular, the general criteria for appraising documents, which are applied regardless of the belonging of documents to a particular system of documentation and regardless of the type of medium of the documented information, were again repeated as part of the general criteria for appraising electronic documents and information resources. Once again, special criteria for appraising electronic scientific and technical documents repeating the special criteria for appraising documents of this system regardless of the type of medium, were mentioned. At the same time, there are no special criteria for appraising electronic documents of other documentation systems, for example, audiovisual, medical, in the guidelines.

One of the main reasons for this confusion is seen as an insufficiently clear understanding of the place of electronic documents as part of functional systems of documentation. As a result, electronic documentation is considered as an independent system that includes all electronic documents of various functional systems. But it is obvious, that general and specific criteria for appraising documents of various functional systems are

universal in nature and should be applied when appraising all the documents of a particular functional system, regardless of the type of material basis.

Nevertheless, the authors of the guidelines were able to define special appraising criteria that take into account the specific nature of an electronic document. These specific criteria should apply to all electronic documents, regardless of their belonging to a particular functional documentation system. According to the guidelines among them are:

- completeness of parts and elements of electronic documents and information resources (for example, the presence or absence of an electronic digital signature, the completeness of metadata);
- the possibility of creating the special fond for use on the basis of electronic documents and information resources in order to improve the quality of use of the documented information in comparison with their analogues on paper;
- the ability to reproduce and process electronic documents and information resources without using additional specialized software throughout the entire storage period;
- availability of metadata for electronic documents and information resources in accordance with the legislation in the field of archival work and records management;
- the ability to create and preserve an electronic copy of a document equal to its paper original in case when it is impossible to save the original document on paper (for example, text fading, gaps);
- preservation of documentation for the software of the information system, in which electronic documents and information resources have been created and exist in order to support the operability of the information system.

If to generalize and somewhat simplify the content of the above mentioned criteria, it will become obvious, that some of them are analogues of the general criteria from the group of external features of the document, but in a slightly modified form, taking into account the special nature and structure of the electronic document. This is clearly demonstrated by the comparison of several criteria of the two corresponding groups:

Special criteria for appraising electronic documents	Group of criteria for the external features of the document
Completeness of parts and elements of electronic documents and information resources (for example, the presence or absence of an electronic digital signature, the completeness of metadata)	The authenticity of the document and its legal reliability (the presence of signatures, dates, seals). The presence of resolutions, notes.
Availability of metadata for electronic documents and information resources in accordance with the legislation in the field of archival work and records management.	The authenticity of the document and its legal reliability (the presence of signatures, dates, seals). The presence of resolutions, notes.
The ability to reproduce and process electronic documents and information resources without using additional specialized software throughout the entire storage period.	Features of the material medium of the document. The physical condition of the document.
the ability to create and preserve an electronic copy of a document equal to its paper original in case when it is impossible to save the original document on paper (for example, text fading, gaps).	Features of the material medium of the document. The physical condition of the document.

Among the special criteria for appraising electronic documents and information resources given in the methodological recommendations, the most important seems to be the two ones:

- the ability to reproduce and process electronic documents and information resources without using additional specialized software throughout the entire storage period. The application of this criterion provides for the creation of electronic documents and information resources in open formats, the possibility of converting or migrating electronic documents and information resources within the records management information system and information system for archival storage in order to ensure their storage;
- preservation of documentation for the software of the information system, in which electronic documents and information resources have been created and exist in order to support the operability of the information system.

Both these criteria actually represent special requirements for information systems in which electronic documents and information resources are created and stored. The presence of such requirements made it possible to single out an additional stage in the process of appraising electronic documents and information resources in comparison with the stages of appraising documents on a traditional (paper) medium.

So, the methodological recommendations determined that the appraisal of electronic documents and information resources in an organization should be carried out at the following stages:

- designing an information system that will be used for creation and circulation of electronic documents, as well as creation and operating an information resource;
- elaborating filing plan indicating the names of files and their storage periods;
- preparation of electronic documents and information resources for transfer for storage in the archive of the organization;
- upon expiration of the period of temporary storage of electronic documents and information resources in the organization established by the legislation.

It is obvious that these stages generally correspond to the stages of the appraisal of documents on paper, enshrined in the Rules of Work for the Archives of State Bodies and Other Organizations (Постановление Министерства юстиции Республики Беларусь от 24 мая 2012 г. № 143 «Об утверждении Правил работы архивов государственных органов и иных организаций», 2012, chapt. 8, pt. 51). A fundamentally important difference is the presence of the first stage – the stage of designing an information system, in which electronic documents and information resources will be created and used.

In fact, this implies that the projected information system must have functionality that allows to create electronic documents in formats suitable for storage for a specified period, including for permanent storage, as well as transfer these documents to other information systems, including information systems of the archive of the organization and the state archive without losing their identity (authenticity). Compliance with this requirement should allow in the future to select electronic documents, created and stored in such an information system, on bases of general and special criteria for appraising documents related to different functional documentation systems.

## CONCLUSION

The performed analysis allows us to conclude that when appraising electronic documents, the informational essence of the document, its potential as a historical source are of paramount importance. An electronic document has the same informational characteristics and purposes of creation as documents on other media, therefore, the appraisal of electronic documents should be carried out on the basis of general criteria of appraisal, primarily the criteria of origination and content. Depending on the belonging of an electronic document to a particular functional system of documentation, general criteria should be supplemented by specific criteria, that are used when appraising documents of this particular system.

A group of criteria of the external features of a document has a significant specificity when appraising electronic documents. For example, the criteria of authenticity and legal reliability used when appraising traditional (paper) documents, are transformed into the criteria of presence of metadata, completeness of parts and elements when appraising electronic documents.

The physical nature of an electronic document is of secondary importance in the appraisal and should be taken into account in terms of its suitability for long-term preservation, confirmation of its identity (authenticity) throughout its existence, and the possibility of use in future. For these purposes, it is of fundamental importance to follow the established requirements for the creation, processing and storage of electronic documents at all stages of their life cycle – from the design of information systems in which electronic documents or information resources will be created, and ending with their storage in information systems of the archive of the organization and the state archive.

Considering that electronic documents are created and exist in certain information systems, it is important to preserve project documentation for these systems. This will allow in the future to maintain their working condition, including using the emulation method, correctly reproduce the documents and information contained in them and, if necessary, convert and migrate documents to other information systems without losing their identity (authenticity).

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*Typology: 1.01 Original scientific research*



Stefano Allegrezza<sup>1</sup>

## "WE ARE WHAT WE CHOOSE TO KEEP": REFLECTIONS ON APPRAISAL PRACTICES IN PERSONAL ARCHIVES

### Abstract

*The paper aims at presenting some reflections on appraisal practices usually adopted in personal archives, and in particular in born digital personal archives. In these types of archives people put into practice different appraisal strategies; in some cases they delete as much as possible and probably also what should not be deleted, in other cases they keep everything without deleting anything; in still other cases they put in place intermediate approaches. These different types of approaches are particularly evident when we consider two types of archives that are very important in personal archives: photo archives and email archives. What is delivered to posterity is particularly influenced by the choices made by the creator during appraisal practices not only on the basis of his understanding of the records' value but also on the basis of completely subjective decisions. In other words, the choices on the appraisal of records heavily affect the transmission of the archive to the heirs or to archival institutions: only what the producer (or his descendants and collaborators) decides to transmit will be transmitted. In conclusion, the personality of the producer that emerges from the archives heavily depends on the decisions taken during appraisal practices.*

**Keywords:** *personal archives, personal digital archives, personal records, appraisal, disposal*

## SIAMO QUELLO CHE SCEGLIAMO DI MANTENERE": RIFLESSIONI SULLE PRATICHE DI VALUTAZIONE NEGLI ARCHIVI PERSONALI

### Sintesi

*Il contributo si propone di presentare alcune riflessioni sulle pratiche di valutazione solitamente adottate negli archivi personali, ed in particolare negli archivi personali nativi digitali. In questi tipi di archivi le persone mettono in pratica diverse strategie di valutazione; in alcuni casi cancellano il più possibile e probabilmente anche ciò che non dovrebbe essere cancellato, in altri casi conservano tutto senza cancellare nulla; in altri casi ancora mettono in atto approcci intermedi. Questi diversi tipi di approccio sono particolarmente evidenti quando si considerano due tipi di archivi molto importanti negli archivi personali: archivi fotografici e archivi di posta elettronica. Ciò che viene consegnato ai posteri è particolarmente influenzato dalle scelte compiute dal creatore durante le pratiche di valutazione non solo sulla base della sua comprensione del valore dei documenti ma anche sulla base di decisioni del tutto soggettive. In altre parole, le scelte sulla valutazione degli atti incidono pesantemente sulla trasmissione dell'archivio agli eredi o alle istituzioni archivistiche: verrà trasmesso solo ciò che il produttore (oi suoi discendenti e colla-*

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boratori) deciderà di trasmettere. In conclusione, la personalità del produttore che emerge dagli archivi dipende fortemente dalle decisioni prese durante le pratiche di valutazione.

**Parole chiave:** archivi personali, archivi personali digitali, atti anagrafici, valutazione, scarto

## "SMO TO KAR ŽELIMO OBDRŽATI": REFLEKSIJE O PRAKSAH VREDNOTENJA V OSEBNIH ARHIVIH

### **Povzetek**

Namen prispevka je predstaviti nekatera razmišljanja o praksah vrednotenja, ki se običajno uporabljajo v osebnih arhivih, zlasti v digitalnih osebnih arhivih. Pri tovrstnem arhiviranju ljudje izvajajo različne strategije vrednotenja; v nekaterih primerih izbrišejo čim več in verjetno tudi tisto, česar se ne sme izbrisati, v drugih primerih obdržijo vse, ne da bi karkoli izbrisali; nekateri pa uporabljajo kombinirane pristope. Te različne vrste pristopov so še posebej očitne, če upoštevamo dve vrsti arhivov, ki sta zelo pomembni v primeru osebnih arhivov: arhiv fotografij in arhiv elektronske pošte. Na to, kar se shrani za naslednje generacije, vplivajo predvsem odločitve, ki jih ustvarjalec pri vrednotenju sprejema ne le na podlagi lastnega razumevanja vrednosti zapisov, temveč tudi na podlagi povsem subjektivnih odločitev. Z drugimi besedami, izbire o vrednotenju gradiva močno vplivajo na ohranjanje arhiva za dediče oziroma za arhivske ustanove: ohranjenost bo le tisto, kar se ustvarjalec gradiva (ali njegovi potomci in sodelavci) odloči/jo posredovati. Skratka, osebnost ustvarjalca arhivskega gradiva močno vpliva na odločitve, vezane na hrambo gradiva in ocena kaj ohraniti.

**Ključne besede:** osebni arhivi, osebni digitalni arhivi, osebni dokumenti, vrednotenje, izločanje

## INTRODUCTION

In archival science appraisal is defined as the «assessment of records to determine their value as primary source material providing evidence of the history of the organization, family or individual» (Crockett, 2016). Appraisal or selection of records for permanent or archival value is widely considered by archivists as one of their most important tasks (Boles, 2005). Usually when we think of appraisal we refer to the process carried out by a member of a memory institutions (often a professional archivist) in which a body of records is examined to determine its value for that institution for the purposes of inclusion in the holdings of the repository.

In the case of personal archives<sup>2</sup>, the typical scenario is that of an archivist working at a memory institution that receives the personal records of a notable person (a writer, a poet, an artist, a scientist, a politician...) and needs to evaluate the archival value of those records. However, personal archives are not transferred in their entirety to the memory institution because before the transfer they undergo another appraisal, possibly with the disposal of a part of the records, by the records creator himself/herself (or by the heirs if he/she is deceased). We can therefore say that appraisal of personal records is usually delivered in two levels: at a first level, there is the appraisal conducted by the creator, who decides what he/she wants to keep before the transfer to the preservation institution; and, at a second level, there is the appraisal conducted by the memory institution. The process of appraisal at the first level is an important one, and it deserves more studies and thoughts by archivists.

In this paper I will focus on the appraisal function from the point of view of the creators instead of the point of view of the archivists of the memory institution, and in particular on personal digital archives, that are one of the most underrepresented areas of archival theory and practice despite their importance for a large variety of scientific studies (Bass, 2012). With the ubiquity of digital phones and cameras, our memory institutions are beginning to ingest an increasingly large number of born-digital media, much of it coming from personal digital archives (Besser, 2011).

The field of personal archives has long been neglected by professionals, and most of the literature on the appraisal of records has focused on records created by public administrations and government bodies. A similar debate have not occurred concerning personal records. Business functions or corporate transactions have also been emphasized as the key unit of analysis in methods created for the archival management of digital data. It is worth considering that "the administrative or government focus of much archival thinking has been especially evident in recent debates about records appraisal and records acquisition. Personal archives require a different appraisal approach than do administrative or government records" (Hobbs, 2001). Hobbs wrote his paper in 2001 but things haven't changed much since then. If we look at the literature that has been published on the subject of personal archives, we see that the function of evaluation is often only hinted at and in some cases completely ignored. On the contrary, appraisal is one of the most important functions, especially in personal archives in a digital environment, as we will point out below. Furthermore, the appraisal of personal records made by the records creator himself is a topic that has quite never been focused on. The scientific debate has not produced specific retention and disposition schedules for per-

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2 Personal archives usually consist of personal records such as letters, diaries, address books, postcards, telegrams, photo albums, loose photographs, records relating to studies (degree thesis), records relating to the state of health (reports, iconographic documentation, copies of medical records) and legal-economic-patrimonial records such as deeds of sale, wills, accounting records, invoices, bills, bank statements, plans, maps, projects, tax documentation.

sonal archives, nor are there any classification schemas or guidelines that can help the creators to correctly manage their archives.

## WHERE PEOPLE KEEP THEIR PERSONAL RECORDS?

In a digital environment, traditional methods of appraisal need to be revised to take into account the need to archive objects before they become obsolete (Paradigm Project, 2008). But before a creator can begin the appraisal process he/she needs to find his or her personal records. It is important to have a clear idea of what is in the personal digital archive before starting any appraisal process. So, the first reflection is about the issue of finding creator's personal records.

Working out where all the digital stuff is can be difficult. Many people tend to scatter personal digital records across multiple devices, across multiple storage media, across multiple platforms and services, a habit that is most often justified by the fear of losing records (so multiple copies are made and the same records are duplicated, tripled, quadrupled on multiple storage media) but that inevitably generates disorder and confusion. Creators might have messages and pictures on social media platforms or websites (Facebook, Flickr, Instagram, Pinterest), textual documents on their computers or on cloud platforms (Google Docs, DropBox), videos on their phone or on social media (such as Vimeo or YouTube), emails on webmail sites (such as Gmail, Hotmail, etc.), not to mention material of all kinds spread across different cloud storage services such as Amazon Drive, Dropbox, Google Drive, OneDrive, etc. As a consequence, today it has become difficult to even give an answer to the simple question "where is that particular photo?" or "where did I put that particular document?". Moreover, there is the risk that the creator ends up forgetting where the records are, and they often end up being abandoned to themselves. Perhaps he/she has uploaded photographs or audiovisual recordings to a virtual space and then forgotten about them. Or he/she has shared records with someone on a cloud space and he/she can no longer remember where or what the access link is. And we must also consider that, unfortunately, cloud services providers, after a certain period of time from the last access (which depends on the policies that each provider adopts, but usually does not last more than one or two years), provides for their final removal without any possibility of recovery. This is a completely unintentional form of appraisal that leads, however, to the complete loss of the records. So the first question to answer is "where are my records"?

Finding and accessing digital material on the creator's *computer* should be relatively straightforward. First you need to check your desktop and default folders such as 'Documents', 'Pictures' and 'Downloads' along with any synced folders such as OneDrive or iCloud Drive. But there may be records that are difficult to locate on your machine.

*Mobile devices* can be one of the more complicated places to access your digital material for archiving (University of Westminster Library, 2021). This is because we frequently access our content on mobile devices through apps. We normally don't need to know or care where the files that make up that material are stored when we use mobile apps (on our device, the cloud or both)<sup>3</sup>. However, in order to keep our data safe, we must be able to copy everything off of our mobile devices and onto other devices such as a computer or external hard drive. You can have problems getting your item out of the program or hardware that's storing it once you've located it.

3 Some common places to look include the DCIM folder for pictures and video and the Download folder for content you've saved from the web. You can also look in folders named after individual apps so, for example, images you've sent over WhatsApp will be in WhatsApp\Media\WhatsApp Images.

Don't forget to check *other hardware* where you might have stored your files. This could include USB flash drives, external hard drives, memory cards, optical media such as DVDs or CDs (Bass, 2013).

Many *cloud storage providers*, such as Amazon Drive, OneDrive, Dropbox, Google Drive, and iCloud Drive, will already have a local copy of your files in the appropriate folder on your computer. If not, you can do so by installing a tiny synchronization software. You can also download individual files and folders from the cloud service's website.. Many cloud storage providers will also make material available to download in bulk. As well as personal accounts, people should remember to look at institutional shared drives or Google accounts, such as those provided at work. They should be aware that if they move jobs or finish their courses, they will lose access to their work or university accounts. For example, they will only retain access to your work or university account for up to a limited period of time.

People should be able to download individual pictures or videos from *social media* sites from within their website or app. Most social networks and other online services will also provide some ability to bulk download your personal data as part of their obligations under data portability legislation in force in each Country.

If the creator has lots of records it might be useful to make a list of what they are (see fig. 1), where you can find them, how you can access them, whether you want to keep them and whether you want to pass them on to the heirs. This is a sort of digital assets inventory that will be very useful in case the creator dies suddenly (or he loses his/her memory!) for the heirs to recover his/her personal archive (University of Westminster Library, 2021). Creators should not forget to also write down the authentication credentials needed to access those records. This is an absolutely essential step: in order to ensure that your records are safe and that you can take care of them, creators need access to the files themselves, which is impossible without login credentials.



Fig. 1: Common types of digital assets (Levine, 2018)

## WHY PEOPLE APPRAISE THEIR RECORDS

Usually, appraisal in personal archives is not driven by the desire to select for permanent preservation records that have a cultural or historical value, because normally few people have the perception that their archives could be transferred to a preservation institution in the future<sup>4</sup>.

Generally, creators appraise their records for very concrete reasons. In many cases they make appraisal when they realize that the amount of material they have accumulated has reached a size that is no longer manageable (Marshall, 2008). Although the transition to the digital world seems to provide the illusion that it is possible to store everything and that there are no limits to the amount of storage available, actually things are not exactly like that. For example, storage is finite and costs money: for security reasons creators will need to keep multiple copies of their files, this will soon add up if you decide to keep everything. There is also an environmental cost to digital storage.

In other cases there are technological reasons: for example, the mailbox of the creator could have limitations on the storage size (such as 1 GB, 2 GB, etc.) and when the mailbox is full he/she needs to delete the oldest messages. There may also be other reasons. For example, accounting or tax records are discarded after a certain period of time (usually after 3, 5 or 10 years, depending on the regulations in place in the various Countries).

You can't keep everything. While the percentage varies, and can never be proven with finality, the usual estimate is that between 1 and 5 per cent of all institutional records created are retained for permanent preservation in archives (Cook, 2011). This is true of all archives but this is particularly true for personal digital archives. If the amount of material grows beyond certain limits, it is very difficult, if not impossible, to find the records you need at the right time, even if you rely on the search functions that modern systems allow you to use. *Keeping everything is like keeping nothing!*

In some cases the creator, when he begins to have the perception that his/her archive could be acquired in the future by a memory institution (or could pass to his/her heirs), deliberately deletes records that could put him in a bad light or reveal unpleasant personality traits. In some cases creators appraise and dispose records containing sensitive or personal information about themselves and others and they don't want them to fall into the wrong hands. This is a first level of appraisal followed by disposal or segregation. In other words, what is transmitted to posterity is decided not so much by the archivist when acquiring personal fonds to the preservation institution but is decided by the creator in an earlier phase so it is the creator who decides what to leave and what not to leave of his records. In this sense the "we are what we choose to keep" maxim explains well what happens in personal archives<sup>5</sup>, because the creator (or the heirs) make more or less voluntary appraisal to safeguard his or her figure by eliminating inconvenient records and so delivering to posterity a figure different from the actual one. Therefore, personal archives are 'self-representations' in which the will of the creator plays a very strong role (Giorgi, 2019; Douglas, 2009).

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4 In fact, many people are recognized as important persons not while they are alive but several years after their death!

5 This maxim recalls the theme of the annual conference of the Society of Archivists (U.K.) that was held in 2010: "We are what we keep: challenging tradition in appraisal and acquisition".

## DECIDING WHAT TO KEEP: THE APPRAISAL DILEMMA

Once the creator has a good idea of what he/she has, and where it is, he needs to start thinking about what to include in his/her personal digital archive. Unfortunately, unlike the archives of public administration and organizations, the archivists' community has not proposed tools for personal archives that can guide the creators in the activities of creation, management and preservation of their archives: there are no classification schemas, no appraisal and disposal plans, no guidelines, no best practices, no specific software to use. Personal archiving differs from archiving in an organization or government department in that the individual's daily life does not revolve around a set of tasks within a narrowly defined mandate. Nor is the creator of a personal archive governed by broadly imposed document management strategies (Paradigm Project, 2008).

So how do people decide what to keep? Ultimately this is a personal decision but there are a few things they can think about to help them. Archivists often talk about records having primary and secondary value (University of Westminster Library, 2021). *Primary value* refers to a record's value to the creator, for example for administrative, legal or financial purposes. You could apply this idea to your own records, thinking about things you need to keep because they are important for your studies, job applications, or financial transactions such as a tenancy agreement. *Secondary value* refers to the wider historical value that records might have for researchers. You could use this idea to think about records that document important events in your life, or work that you think is of lasting value. Perhaps you have been involved in cultural or political movements that you think should be recorded. If something doesn't have primary or secondary value, it probably doesn't belong in your personal digital archive.

In personal archives, apart from subjective evaluations (such as the administrative-legal or historical-cultural or even emotional value that records may have), there are also appraisal actions that are based on objective considerations.

For instance, you might want to consider removing duplicate files, albeit this can be time consuming, so just get rid of those that are useless; delete drafts (probably you only need to keep final versions): if you do want to save some drafts, for example in order to show how a piece of work has developed, just pick a few representative examples; saving email or other messages along with the work they relate to can be useful, but you probably don't need every single email and you could delete those emails whose value is equivalent to a phone call or a SMS or WhatsApp message. There is a degree of subjectivity in these actions as well, but having rules to follow can be very helpful.

## HOW PEOPLE APPRAISE THEIR PERSONAL RECORDS

People put into practice different appraisal strategies; in some cases they delete as much as possible (and sometimes also what should not be deleted), in other cases they keep everything without deleting anything; neither the first nor the second strategy is perfect and probably it is better to put in place an intermediate approach.

The different types of approaches are particularly evident when we consider two types of records that are very important in personal archives: photos and email.

A typical example is that of photos we take during our life. In the past, when people went on holidays, they carried with them an analogue camera and a few camera rolls. Therefore, the photographic documentation that was produced on an 'average' holiday consisted of a few hundred photos. Today the situation has completely changed: when people go on holiday, they carry with them an equipment consisting of a digital camera (or a smartphone) and some memory cards and it is not uncommon to come back from

a short vacation - even one week - with some memory cards completely full and tens of gigabytes of photos (but also of audio and video recordings). It has been estimated that more photos have been taken in the last five years than in all previous years combined. In addition, a sort of 'shooting frenzy' has set in: people often take hundreds or thousands of photos, trying to capture every moment of their life, and often they take several photos of the same subject that are very similar between them. A typical example is when you take the classic picture of a group of people in front of us: instead of taking just one picture (or at most two), you take several pictures to be sure of getting a picture in which everyone has the 'most beautiful smile'. But once back home, you should find the time to select the best picture and delete all the others, but this almost never happens, whether out of laziness or lack of time, and the photos all remain in the archive (even if they are practically identical).

Another example of how the methods of appraisal in the personal archives deeply change from a creator to another is that of email. Email has become one of the most ubiquitous, commonly accepted, and easy-to-use means of communication of the modern age. Every professional worker, government official, student, and grandparent and parent rely on email for daily communication. More email messages are being sent than handwritten letters or postcards, and few think it is unusual to be daily or hourly checking communications or even, in a bit of sleeplessness, to be sending messages to friends, relatives, and co-workers in the middle of the night (Cox, 2008). There are different methods for appraising emails: there are some people who archive all emails indiscriminately, while others decide to delete oldest emails when the space when the storage space is reaching its limit and there is no more room for new emails. So there are basically two extreme habits: on the one hand, those who keep all the emails without making any type of appraisal and, on the other hand, those who delete all the mails and therefore keep absolutely anything.

In some cases, appraisal is a random process, neither sought nor desired, but imposed by external factors. This is the case, for example, of personal records that remain forgotten in the cloud storage services and are deleted by service providers after a certain period of time. Or those that remain inaccessible when the creator suddenly dies and has not revealed authentication credentials to anyone else (the so-called digital legacy problem). In all these cases appraisal (or rather: destruction) does not occur due to the creator's will but due to causes completely independent of his/her will.

## CONCLUSIONS

In the transition from the analogue to the digital world there has been an enormous growth in the number of records every single person creates, but this has not been matched by a similar growth in appraisal practices.

In many cases people want to archive and keep everything, trusting that digital 'doesn't take up space' and therefore they can accumulate as much as they want without having to worry about initiating appraisal operations. In the paper-based world, the situation was very different: paper had its own precise physical dimension, it took up physical space and therefore creators had to contrast the accumulation of paper records through appraisal operations at least.

Today, there are also extreme situations, where everything is irretrievably deleted to cope with the amount of material that quickly becomes unmanageable or due to technological limitations (e.g. available space in mailboxes). In some cases, appraisal processes are put in place to try to provide a representation of oneself different from that which might emerge in the future if all records were retained. However, both situations



(retaining everything, without disposition; or retaining nothing, disposing everything) are not effective and put at risk the future of personal archives. *Retaining everything is like retaining nothing.*

Personal recordkeeping raises a series of new «issues and concerns about records and their management and preservation, the mission of professional records managers and archivists, the nature of the role of the institutional archives, and the function of the individual citizen as their own archivist» (Cox, 2008). Archivists need to develop a new partnership with people, and this is particularly important in the digital environment. People need to learn from the archivists the importance of the proper management of personal digital archives and the essentials of creation, management and preservation of their digital records. People need to raise awareness on these issues before it is too late and many of the personal digital archives they are creating in this era are lost before they reach the threshold of archival repositories.

A new archival future is in front of us and whether it will be good or bad greatly depends on how well archivists will be able to interact with the new "citizen archivists".

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## FILE THINNING IN ARCHIVE IN THE CONTEXT OF THE DIGITAL TRANSFORMATION OF THE ITALIAN PUBLIC ADMINISTRATION

### Abstract

*For many years, the Italian Public Administration has started a process of digital transformation of its activity and of the services provided to citizens and businesses. The tools of this transition are the protocol register, the electronic document, the digital signature and certified e-mail, to which are added platforms and infrastructures, innovative services and big data, the cloud and the issues of security and interoperability. In this context, document management is probably the most important element because it cuts across all activities.*

*The Guidelines on the creation management and preservation of electronic documents of the Italian Agency for Digital Government (AgID), in force since January 1, 2022, extensively address the phases of creation, management and preservation of documents and their aggregations in accordance with the law, providing the instructions for operating in compliance with the objectives defined by the Digital Administration Code.*

*The Guidelines re-propose the traditional archival model that affirms the unity of the archive and its functional tripartite division. The appraisal procedures also find an important place in the Document Management Manual and the attached Preservation Plan and underline the importance of preserving materials with administrative, legal and cultural value, but disposing those that do not have them. The thinning is also taken up in the Preservation Plan, which represents a common practice in the analogue context, but rarely implemented in the digital one and which, although extremely useful, today raises questions about its application.*

*Keywords: Italian public administration, digital transformation, electronic document, digital archive, appraisal, retention, disposal, thinning*

## LO SFOLTIMENTO IN ARCHIVIO NEL CONTESTO DELLA TRASFORMAZIONE DIGITALE DELLA PUBBLICA AMMINISTRAZIONE ITALIANA

### Sintesi

*Da molti anni la Pubblica Amministrazione italiana ha avviato un percorso di trasformazione in senso digitale della sua attività e dei servizi erogati a cittadini e imprese. Gli strumenti di questa transizione sono il registro di protocollo, il documento informatico, la firma digitale e la posta elettronica certificata, a cui si aggiungono piattaforme e infrastrutture, servizi innovativi e big data, il cloud e i temi della sicurezza e dell'interoperabilità. In questo contesto la gestione documentale è probabilmente l'elemento di maggiore importanza perché trasversale ad ogni attività.*

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*Le Linee guida sulla formazione, gestione e conservazione dei documenti informatici dell'AgID, in vigore dal 1° gennaio 2022, affrontano in modo esteso le fasi della formazione, gestione e tenuta a norma dei documenti e delle loro aggregazioni, fornendo le istruzioni per operare nel rispetto degli obiettivi definiti dal Codice dell'amministrazione digitale.*

*Le Linee guida ripropongono il modello archivistico tradizionale che afferma l'unitarietà dell'archivio e la sua tripartizione funzionale in fase corrente, di deposito e storica. Anche le operazioni di selezione trovano un posto importante nel *Manuale di gestione documentale* e nell'allegato *Piano di fascicolazione e conservazione* e sottolineano l'importanza di conservare materiali con valore amministrativo, legale e culturale, ma di scartare quelli che ne sono privi. Nel Piano di conservazione viene richiamato anche lo sfoltimento, che rappresenta una pratica comune nel contesto analogico, ma raramente messa in pratica in quello digitale e che, pur di estrema utilità, pone oggi interrogativi sulla sua applicazione.*

*Parole chiave: pubblica amministrazione italiana, trasformazione digitale, documento informatico, archivio digitale, selezione, conservazione, scarto, sfoltimento*

## ZMANJŠEVANJE DATOTEK V ARHIVU V KONTEKSTU DIGITALNE TRANSFORMACIJE ITALIJANSKE JAVNE UPRAVE

### Povzetek

*Italijanska javna uprava je že pred leti začela s procesom digitalne preobrazbe svoje dejavnosti in storitev za državljane in podjetja. Uporabljena orodja v tem procesu vključujejo protokolni register, elektronski dokument, digitalni podpis in certificirano e-pošto. Vse to se navezuje na platforme in infrastrukturo, inovativne storitve, velike podatki, oblak, sočasno pa se ni pozabilo na vprašanja varnosti in interoperabilnosti. V tem kontekstu je upravljanje z dokumenti verjetno najpomembnejši element, saj vključuje vse te dejavnosti.*

*Smernice o upravljanju ustvarjanja in hrambi elektronskih dokumentov italijanske agencije za digitalno vlado (AgID), ki veljajo od 1. januarja 2022, obsežno obravnavajo faze ustvarjanja, upravljanja in hrambe dokumentov ter njihovih združevanj v skladu z zakonodajo, ki daje navodila za delovanje v skladu s cilji, ki jih določa Kodeks digitalne uprave.*

*Smernice ponovno predlagajo tradicionalni arhivski model, ki potrjuje enotnost arhiva in njegovo funkcionalno tristransko razdeljenost. Postopki vrednotenja zavzemajo pomembno mesto tudi v *Priročniku za upravljanje z dokumenti* in priloženem *Načrtu hrambe* ter poudarjajo pomen hrambe gradiva z administrativno, pravno in kulturno vrednostjo, sočasno pa odstranjevanje tistih gradiv, ki te vrednosti nimajo. Zmanjševanje obsega je vključeno tudi v *Načrt ohranitve*, kar je običajna praksa v analognem kontekstu, v digitalnem pa se redko izvaja. Čeprav je ta postopek izjemno uporaben, se danes postavljajo vprašanja o primernosti njegove uporabe.*

**Ključne besede:** *Italijanska javna uprava, digitalna transformacija, elektronski dokument, digitalni arhiv, vrednotenje, hramba, odlaganje, zmanjševanje*

## LA TRASFORMAZIONE DIGITALE DELLA PUBBLICA AMMINISTRAZIONE ITALIANA

Il processo di cambiamento e innovazione che ha preso avvio con l'adozione diffusa delle tecnologie dell'informazione e della comunicazione ormai coinvolge tutte le componenti sociali ed economiche della nostra società e, in questi anni, sta portando alla radicale trasformazione dell'amministrazione pubblica e del rapporto fra PA, cittadino e imprese.

In Italia il percorso di trasformazione è iniziato con la L. 7 agosto 1990, n. 241 che identifica il documento amministrativo anche come rappresentazione elettromagnetica, ed è proseguito con il D.Lgs. 12 febbraio 1993, n. 39 che istituisce l'Autorità per l'informatica nella pubblica amministrazione e dispone che gli atti amministrativi siano di norma predisposti tramite i sistemi informativi automatizzati, e con la L. 15 marzo 1997, n. 59 che stabilisce che atti, dati e documenti formati dalla PA con strumenti informatici o telematici, nonché la loro archiviazione e trasmissione, sono validi e rilevanti a tutti gli effetti di legge. Queste disposizioni, insieme ad altre, hanno aperto la strada ad un più incisivo cammino che ha portato prima all'emanazione del D.P.R. 20 ottobre 1998, n. 428, poi confluita nel D.P.C.M. 31 ottobre 2000, e, soprattutto, del D.P.R. 28 dicembre 2000, n. 445 che, per primo, ha fornito regole semplici e applicabili per l'adozione del protocollo informatico e ha indicato obiettivi chiari, benché complessi da raggiungere (le pubbliche amministrazioni adottano un piano di sviluppo dei sistemi informativi automatizzati; provvedono a realizzare o revisionare sistemi informativi finalizzati alla totale automazione delle fasi di produzione, gestione, diffusione ed utilizzazione dei propri dati, documenti, procedimenti ed atti; valutano in termini di rapporto tra costi e benefici il recupero su supporto informatico dei documenti e degli atti cartacei dei quali sia obbligatoria o opportuna la conservazione e provvedono alla predisposizione dei conseguenti piani di sostituzione degli archivi cartacei con archivi informatici). Inoltre, il D.P.R. 445/2000 ha evidenziato nell'art. 61 le competenze archivistiche come le capacità necessarie per governare la nuova gestione documentale informatica e la sequenza di archivio corrente – archivio di deposito – archivio storico come il modello da seguire, permettendo alla PA di rifarsi alla sua lunga tradizione amministrativa e di trasporre nel mondo digitale capacità e prassi consolidate.

I ministeri e i comuni, le regioni e le province, le scuole e le università, gli ospedali e gli istituti di ricerca si sono impegnati nel ripensare al proprio modello gestionale documentario e il *Codice dell'amministrazione digitale* (CAD), emanato con D.Lgs. 4 marzo 2005, n. 82 ha trovato terreno fertile nel disporre nuovi obiettivi e un uso esclusivo del documento informatico, sottoscritto con firma digitale e trasmesso con posta elettronica certificata. Nel corso degli anni successivi il CAD è stato costantemente aggiornato e ampliato e, ad esempio, nella revisione del 2010 si è intervenuto sull'art. 41 definendo con precisione la funzione e l'uso del fascicolo elettronico. Nei primi anni, però, il Codice è rimasto una norma sconosciuta al di fuori dell'amministrazione pubblica, in quanto tutta rivolta alla riorganizzazione della struttura e dei processi attraverso l'adozione di nuovi strumenti. Dal 2016, però, nel rispetto della delega disposta dalla L. 7 agosto 2015, n. 124, il CAD è stato riorientato all'erogazione di servizi innovativi in funzione dello sviluppo di una reale cittadinanza digitale. Inizia in quel momento una felice fase di crescita in cui l'interesse per l'amministrazione digitale si fa concreta con i cantieri digitali, con l'introduzione della figura del responsabile per la transizione e del difensore civico digitale (art. 17 del CAD), le regole tecniche del 2013 e 2014 che si applicano fra l'ottobre 2015 e l'aprile 2017, con il lavoro dei due commissari straordinari per l'attuazione dell'Agenda digitale Diego Piacentini e poi Luca Attias, con il primo *Piano triennale per l'informatica* nella PA del maggio 2017, a cui seguono le versioni successive del 2019, 2020 e 2022, e con gli innumerevoli progetti innovativi che enti grandi e piccoli portano a termine.

La pandemia ha influito in modo significativo nel percorso di transizione al digitale della PA imponendo grandi trasformazioni. L'esigenza inaspettata di dover lavorare da casa accedendo agli applicativi e ai documenti ha accelerato enormemente l'attenzione verso sistemi gestionali efficaci ed efficienti, l'uso del cloud, la profilazione digitale, le comunicazioni sicure, i servizi da remoto e l'attribuzione del valore giuridico ad operazioni prima condotte solo in presenza come le riunioni degli organi. Se all'interno degli uffici pubblici avvengono fra il 2020 e il 2021 veri e propri stravolgimenti, guidati dai decreti di semplificazione 76/2020 e 77/2021, è nelle case degli italiani che il cambiamento si fa straordinario. Il Covid-19 ha avuto un enorme impatto sulle nostre vite e ci ha visto adottare nuove tecnologie e nuovi comportamenti: l'85% delle persone ha partecipato attivamente al dialogo online, nel 2020 gli acquisti digitali sono raddoppiati e poi cresciuti ancora nell'anno successivo, social e piattaforme di intrattenimento si sono diffuse in modo esponenziale e nel primo anno di pandemia 8,7 milioni di italiani hanno usato i servizi digitali della PA. Anche una lettura superficiale dei dati mostra un elemento di grande rilievo, ovvero che la società oggi è molto più ricettiva ai servizi online della PA che in passato e che, anzi, li richiede con insistenza non accontentandosi più di trovare moduli da scaricare, informazioni di contatto o semplici spiegazione delle procedure. La gente vuole avviare e concludere i procedimenti senza il ricorso alla carta e senza recarsi allo sportello, vuole informazioni circostanziate, vuole dialogare utilizzando le tecnologie ed esprimere il proprio giudizio sulla qualità dei servizi. Per rispondere alle nuove aspettative è indispensabile una gestione documentale efficace, completa e archivisticamente solida. In questo contesto vengono pubblicate e rese operative le Linee guida sui documenti informatici che, finalmente, danno attuazione all'art. 40 del CAD il quale afferma che «le pubbliche amministrazioni *formano* gli originali dei propri documenti ... con mezzi informatici».

## LE LINEE GUIDA AGID E IL MODELLO ARCHIVISTICO

Il 9 settembre 2020 l'Agenzia per l'Italia Digitale (AgID) pubblica sul proprio sito le nuove *Linee Guida sulla formazione, gestione e conservazione dei documenti informatici*, che entrano in vigore il giorno successivo con la pubblicazione in Gazzetta ufficiale del comunicato relativo all'adozione. L'obbligo di applicazione è fissato inizialmente al 7 giugno 2021, poi prorogato al 1° gennaio 2022.

Le Linee guida, che hanno carattere vincolante per tutta la pubblica amministrazione e si applicano anche ai privati, sono state elaborate ricercando uno stile chiaro e fruibile, elencando in sequenza logica le diverse fasi della gestione documentale, pur rappresentandone le relazioni: formazione, gestione e conservazione. Il documento dell'AgID ha una struttura piuttosto semplice formata da quattro capitoli. Nel primo viene definita la natura del documento, indicati i riferimenti normativi ed espressi i principi generali della gestione documentale. Il secondo capitolo affronta il tema della *Formazione dei documenti informatici*, approfondendo gli aspetti relativi alla formazione, ai duplicati e alle copie. Il terzo è dedicato alla *Gestione documentale* e regola la registrazione di protocollo e le altre forme di registrazione, la classificazione dei documenti, marcandone l'obbligatorietà e l'importanza, la fascicolazione e l'organizzazione in serie dei fascicoli, la figura del responsabile della gestione documentale, la natura e i contenuti del Manuale di gestione, oltre ad alcuni aspetti riferiti alla sicurezza e al trasferimento in conservazione dei materiali. L'ultimo capitolo si riferisce alla *Conservazione* e descrive il modello architetturale del sistema, i ruoli e le responsabilità nel processo conservativo, i contenuti del Manuale di conservazione, le misure di sicurezza e, al fondo, si sofferma sulla selezione e lo scarto dei documenti informatici.

Lo scopo dichiarato delle Linee guida è quello di aggiornare le precedenti Regole tecniche e di incorporarle in un unico documento con le circolari in materia. In effetti, le nuove regole italiane sul documento elettronico sono in coerente continuità con il CAD e le disposizioni che le hanno precedute: per la formazione il D.P.C.M. 13 novembre 2014; per il modello organizzativo documentale e il protocollo il D.P.C.M. 31 ottobre 2000, il D.P.R. 445/2000 e le Regole tecniche del D.P.C.M. 3 dicembre 2013; per la conservazione le specifiche Regole tecniche del D.P.C.M. 3 dicembre 2013 (nello stesso giorno sono state emanate due distinte regole tecniche riferite, rispettivamente, al protocollo informatico e alla conservazione). Però, pur confermando l'architettura del sistema documentario (A00 – Servizio – Responsabile – Manuale di gestione), la centralità della gestione documentale per la transizione digitale della PA, i quattro differenti percorsi di formazione del documento elettronico e anche il modello OAIS per la conservazione, ci sono alcune novità rilevanti riguardanti, ad esempio, i formati dei file, la certificazione di processo, il sigillo elettronico qualificato nella segnatura di protocollo.

Ciò che in questo contesto sembra più rilevante è l'affermazione dei principi generali della gestione documentale, che identificano l'intero processo in un'azione coerente finalizzata al controllo efficiente e sistematico delle tre fasi principali di formazione, gestione e conservazione. Tre fasi distinte caratterizzate da attività specifiche le quali però si riferiscono ad un unico flusso di gestione che, in termini archivistici, potremmo identificare con il ciclo di vita del documento. Il richiamo all'approccio archivistico diventa evidente e, infatti, sempre nello stesso paragrafo 1.11 delle Linee guida viene resa esplicita la tripartizione dell'unità dell'archivio con l'elencazione delle qualità della fase corrente, di quella di deposito e dell'archivio storico. Così vengono fatti coincidere il ciclo di vita documentale con la scansione temporale archivistica, che viene assunta come elemento cardine nei processi di formazione, gestione e conservazione. Va detto, però, che tale accettazione disciplinare nel contesto delle disposizioni per l'informatizzazione della PA e la sua transizione al digitale era già ben espressa negli artt. 67 (*Trasferimento dei documenti all'archivio di deposito*), 68 (*Disposizioni per la conservazione degli archivi*) e 69 (*Archivi storici*) del D.P.R. 445/2000.

Nelle Linee guida l'attenzione alla selezione conservativa è molto presente e disposizioni o raccomandazioni sono individuabili in molti paragrafi. Nel 3.5 (*Manuale di gestione documentale*) più volte si indica l'obbligatorietà di definire un documento, integrato al piano di classificazione e alle indicazioni di fascicolo, con le informazioni relative ai tempi, ai criteri e alle regole per il trasferimento in conservazione delle diverse tipologie di oggetti digitali e alle operazioni di selezione e conservazione, con riferimento alle procedure di scarto. Le operazioni di valutazione sono poi ricordate anche nel paragrafo 4.6 (*Manuale di conservazione*) in merito ai tempi di versamento nell'archivio digitale e, di seguito, l'intero ultimo paragrafo 4.11 (*Selezione e scarto dei documenti informatici*) è dedicato a fornire al responsabile della conservazione le istruzioni per la selezione e lo scarto dei pacchetti informativi di archiviazione.

Infine, le Linee guida richiamano in più punti la disciplina in materia di beni culturali con particolare riguardo all'art. 21 del D.Lgs. 22 gennaio 2004, n. 42, *Codice dei beni culturali*, che indica l'obbligo di acquisire dagli organi competenti del Ministero della Cultura in materia di tutela dei beni archivistici (Soprintendenze archivistiche o Archivi di Stato tramite le commissioni di sorveglianza) l'autorizzazione al trasferimento a un sistema di conservazione di documenti e aggregazioni documentali informatiche o allo scarto. Proprio ai processi di conservazione e alla selezione preliminare allo scarto della documentazione inutile fanno riferimento altri paragrafi delle Linee guida, affinché si preoccupano che anche in ambito digitale, e specialmente nel contesto del processo di conservazione, non vengano eliminati documenti e fascicoli utili all'amministrazione pubblica.

## IL PIANO DI FASCICOLAZIONE, CONSERVAZIONE E SCARTO

Il Manuale di gestione, che è lo strumento che definisce il modello di governo documentale e quindi anche le regole per la formazione delle aggregazioni, in coerenza con il quadro di classificazione, deve obbligatoriamente includere il *Piano di fascicolazione e di conservazione*. Il Piano indica quali tipologie di fascicoli e di serie si formano all'interno di ciascuna voce di titolario, prescrive il modello di associazione dei documenti e precisa i tempi di conservazione, selezione periodica e scarto del materiale.

Il Piano di fascicolazione e conservazione stabilisce quindi il modello di aggregazione dei documenti, le regole di fascicolazione e i tempi di attività, semiattività e inattività del materiale documentario. Sviluppato nel rispetto del titolario di classificazione in uso presso l'AOO, indica quali tipologie di fascicoli e di serie si formano all'interno di ciascuna voce di ordinamento, quali documenti tipici sono presenti nei fascicoli e propone l'eventuale formazione di sottofascicoli. Inoltre, il Piano indica per ciascuno dei fascicoli e sottofascicoli i tempi di conservazione, ovvero quali dovranno essere conservati senza limiti di tempo e quali invece saranno scartati dopo un numero variabile di anni, che viene stabilito dopo attenta valutazione in riferimento alla rilevanza amministrativa, finanziaria e legale, nonché all'importanza storica e culturale. Infatti, alcuni dei documenti prodotti nello svolgimento della propria attività perdono la loro utilità al momento della definizione dell'affare, altri dopo un certo periodo di tempo, altri ancora mai. Infine, va anche detto che lo scarto è un'operazione necessaria alla sopravvivenza stessa dell'archivio ed è resa obbligatoria da quanto disposto sia dal D.P.R. 445/2000 che dalle Linee guida AgID del 2020.

Il Piano di conservazione dei documenti archivistici permette l'identificazione e la protezione dei documenti vitali e utili all'azione della PA, lo spostamento dei documenti fra diverse aree del sistema di conservazione, il passaggio di responsabilità, la soddisfazione degli obblighi di trasparenza amministrativa, il procedimento di scarto con la richiesta di autorizzazione statale e la distruzione dei documenti che hanno esaurito la loro utilità.

Elaborare il Piano di fascicolazione e conservazione non è semplice, perché presuppone una profonda conoscenza del funzionamento dell'ente e un'attenzione speciale per i differenti aspetti della gestione documentale, nonché una forte sensibilità nell'identificare il valore dei documenti così da salvaguardarli al meglio. Per l'indicazione dei tempi di conservazione, e quindi del momento in cui i materiali potranno essere eliminati, si possono utilmente consultare le norme e le disposizioni vigenti e storiche e si può fare ricorso ai massimari di scarto di riferimento, consultare gli elenchi di scarto già realizzati, verificare la sedimentazione archivistica, attingere all'esperienza dei colleghi e confrontarsi con altri enti con funzioni e competenze analoghe e, naturalmente, non dimenticare di coinvolgere la Soprintendenza archivistica o l'Archivio di Stato del territorio.

Una volta identificati i fascicoli e le serie di fascicoli e aver attribuito ai documenti un tempo di conservazione in relazione al loro valore amministrativo, legale e storico, si può procedere a redigere il Piano di fascicolazione e conservazione, che deve comprendere alcuni elementi finalizzati all'identificazione della documentazione da gestire e ulteriori indicazioni necessarie per guidare l'azione conservativa (fra cui la raccomandazione di non portare in conservazione documenti di evidente inutilità e quindi di provvedere allo sfoltimento). La tabella deve includere almeno i seguenti campi:

- il codice e la voce di classificazione che fa riferimento al titolario di classificazione degli atti approvato dall'AOO;
- il titolo normalizzato della serie o dei fascicoli;



- una breve descrizione della documentazione prevista per il fascicolo o la serie di fascicoli;
- il contenuto tipico dei fascicoli;
- l'eventuale presenza di sottofascicoli;
- la possibile presenza di documenti con dati personali, sensibili o giudiziari, o comunque riservati;
- l'ufficio responsabile o di riferimento;
- i tempi di conservazione, eventualmente dettagliati per i sottofascicoli e con il suggerimento della campionatura per le serie di fascicoli corpose, ma rilevanti almeno a fini storici;
- i riferimenti legislativi;
- le annotazioni necessarie.

## LO SFOLTIMENTO DELLA DOCUMENTAZIONE DIGITALE

Il richiamo alla conservazione selettiva è un elemento costante del modello di gestione documentale italiano e coinvolge sempre le tre parti dell'archivio: l'archivio corrente, l'archivio di deposito e l'archivio storico. L'operazione di selezione finalizzata allo scarto si realizza al momento del versamento della documentazione dall'archivio di deposito a quello storico, con la tempistica indicata dal Piano di fascicolazione e conservazione. Invece, la scelta della documentazione da conservare che si opera in occasione del passaggio dei fascicoli dalla fase corrente al sistema di conservazione si definisce sfoltimento.

Una volta conclusa la pratica e chiuso il fascicolo, prima del trasferimento dall'archivio corrente a quello di deposito, è buona abitudine procedere a sfoltire il fascicolo dei documenti inutili.

Lo sfoltimento si realizza estraendo ed eliminando i documenti di carattere strumentale e transitorio utilizzati per espletare il procedimento, ma che hanno esaurito la loro funzione nel momento in cui è stato emesso il provvedimento finale, oppure quelli che non sono strettamente connessi al procedimento stesso. Documenti, quindi, che sicuramente non sono più utili per l'azione amministrativa, che non svolgono una funzione di testimonianza legale e che non acquisiranno alcun valore storico o culturale. Si tratta, ad esempio, di appunti, promemoria, minute, copie, normativa, documenti di carattere generale, materiali acquisiti come documentazione o come precedente, documenti interlocutori. Tale operazione si realizza senza l'osservanza delle procedure di scarto previste dall'art. 21 del Codice dei beni culturali.

Lo sfoltimento è un'operazione attuata comunemente nell'ambito analogico, anche se in tempi recenti veniva talvolta tralasciata in concomitanza di una minore attenzione alle pratiche archivistiche. L'amministrazione digitale, però, nell'assumere la disciplina archivistica come riferimento unico per la gestione documentale, e nella consapevolezza che i documenti informatici sono generalmente più complessi da identificare velocemente rispetto ai documenti cartacei, ha ripreso pratiche tradizionali assumendole come elementi di qualità, e fra queste anche lo sfoltimento.

In ambito digitale l'operazione di sfoltimento è certamente più complessa rispetto al contesto analogico, ma una corretta gestione documentale può aiutare a svolgere questa funzione, ad esempio suddividendo il fascicolo elettronico in sottofascicoli caratterizzati da tempi di conservazione specifici. Uno di questi sottofascicoli può essere destinato a raccogliere i documenti individuati per l'eliminazione immediata fin dal momento della formazione. Naturalmente, l'operazione va prevista nel Manuale di gestione e indicata nel Piano di fascicolazione e conservazione.

Lo sfoltimento è una pratica estremamente delicata e presuppone una perfetta conoscenza della documentazione conservata nel fascicolo. Per questo motivo dev'essere realizzata dal responsabile del procedimento o da un suo delegato. In questo senso lo sfoltimento è un'azione personale, modesta e apparentemente poco rilevante, ma che assume nel contesto elettronico un ruolo essenziale perché alleggerisce immediatamente l'onere della tenuta dell'archivio digitale e facilita l'assolvimento degli obblighi di accesso e di trasparenza amministrativa.

## RIFERIMENTI NORMATIVI

- D.Lgs. 12 febbraio 1993, n. 39, *Norme in materia di sistemi informativi automatizzati delle amministrazioni pubbliche*
- L. 15 marzo 1997, n. 59, *Delega al Governo per il conferimento di funzioni e compiti alle regioni ed enti locali, per la riforma della pubblica amministrazione e per la semplificazione amministrativa*
- D.P.R. 20 ottobre 1998, n. 428, *Regolamento recante norme per la gestione del protocollo informatico da parte delle amministrazioni pubbliche*
- L. 7 agosto 1990, n. 241, *Nuove norme in materia di procedimento amministrativo e di diritto di accesso ai documenti amministrativi*
- D.P.C.M. 31 ottobre 2000, *Regole tecniche per il protocollo informatico di cui al decreto del Presidente della Repubblica 20 ottobre 1998, n. 428*
- D.P.R. 28 dicembre 2000, n. 445, *Testo unico delle disposizioni legislative e regolamentari in materia di documentazione amministrativa*
- D.Lgs. 30 giugno 2003, n. 196, *Codice in materia di protezione dei dati personali*
- L. 9 gennaio 2004, n. 4, *Disposizioni per favorire l'accesso dei soggetti disabili agli strumenti informatici*
- D.Lgs. 22 gennaio 2004, n. 42, *Codice dei beni culturali e del paesaggio*
- D.Lgs. 4 marzo 2005, n. 82, *Codice dell'amministrazione digitale*
- D.P.C.M. 3 dicembre 2013, *Regole tecniche per il protocollo informatico ai sensi degli articoli 40-bis, 41, 47, 57-bis e 71, del Codice dell'amministrazione digitale di cui al decreto legislativo n. 82 del 2005*
- D.P.C.M. 3 dicembre 2013, *Regole tecniche in materia di sistema di conservazione ai sensi degli articoli 20, commi 3 e 5-bis, 23-ter, comma 4, 43, commi 1 e 3, 44, 44-bis e 71, comma 1, del Codice dell'amministrazione digitale di cui al decreto legislativo n. 82 del 2005.*
- D.P.C.M. 13 novembre 2014, *Regole tecniche in materia di formazione, trasmissione, copia, duplicazione, riproduzione e validazione temporale dei documenti informatici nonché di formazione e conservazione dei documenti informatici delle pubbliche amministrazioni ai sensi degli articoli 20, 22, 23 -bis , 23 -ter , 40, comma 1, 41, e 71, comma 1, del Codice dell'amministrazione digitale di cui al decreto legislativo n. 82 del 2005*
- L. 7 agosto 2015, n. 124, *Deleghe al Governo in materia di riorganizzazione delle amministrazioni pubbliche (art. 1, Carta della cittadinanza digitale)*
- Linee Guida sulla formazione, gestione e conservazione dei documenti informatici, Agenzia per l'Italia Digitale, pubblicazione 9 settembre 2020, revisione maggio 2021*

## **Summary**

*For many years, the Italian Public Administration has started a process of digital transformation of its activity and of the services provided to citizens and businesses. The tools of this transition are the protocol register, the electronic document, the digital signature and certified e-mail, to which are added platforms and infrastructures, innovative services and big data, the cloud and the issues of security and interoperability. In this context, document management is probably the most important element because it cuts across all activities.*

*The Guidelines on the creation management and preservation of electronic documents of the Italian Agency for Digital Government (AgID), in force since January 1, 2022, extensively address the phases of creation, management and preservation of documents and their aggregations in accordance with the law, providing the instructions for operating in compliance with the objectives defined by the Digital Administration Code.*

*The Guidelines re-propose the traditional archival model that affirms the unity of the archive and its functional tripartite division. The appraisal procedures also find an important place in the Document Management Manual and the attached Preservation Plan and underline the importance of preserving materials with administrative, legal and cultural value, but disposing those that do not have them. The thinning is also taken up in the Preservation Plan, which represents a common practice in the analogue context, but rarely implemented in the digital one and which, although extremely useful, today raises questions about its application.*

*Typology: 1.01 Original scientific research*

Liudmila Varlamova<sup>1</sup>

## NEW APPROACH TO SYSTEMATIZATION OF DOCUMENTS FOR DETERMINING THEIR RETENTION PERIOD

### Abstract

*At the present stage, due to a wide penetration of information technologies into recordkeeping and archiving processes, there is an actual merging of the stages of operational work with documents in recordkeeping and their preservation as well as storing in the archives. The modern archival storing of documents in most organizations is undergoing a transition from the stage of physical storing of a collection of paper documents (including their physical transfer and storage in the traditional paper archives) to the virtual stage (conducted through online transfer of electronic documents to the cloud storage or virtual archives). In this context, there are new challenges regarding the practice of documents' appraisal and determining their retention period. Methods of registration, systematization and appraisal of documents, which have proven their worth and are widely used for working with paper documents, have become of little use for electronic documents and are subject to revision. It is also actual for the principles of documents' registration in management process, because in modern electronic document management systems (EDMS) the systematization of electronic documents into files takes on a different meaning and requires changes in the principle of their description and appraisal. This paper presents the author's vision on how to modernize the principles of documents' registration as well as determining and fixing their retention period at the stage of recordkeeping, and as a result, to facilitate the process of their appraisal and selection for their transfer to the preservation in the archives.*

*Keywords: archiving, recordkeeping, appraisal, retention period, disposition.*

## NUOVO APPROCCIO ALLA SISTEMATIZZAZIONE DEI DOCUMENTI PER DETERMINARE IL LORO PERIODO DI CONSERVAZIONE

### Sintesi

*Allo stato attuale, a causa di un'ampia penetrazione delle tecnologie informatiche nei processi di registrazione e archiviazione, si verifica una vera e propria fusione delle fasi del lavoro operativo con i documenti in archivio e la loro conservazione nonché conservazione negli archivi. L'archiviazione moderna dei documenti nella maggior parte delle organizzazioni sta attraversando una transizione dalla fase di archiviazione fisica di una raccolta di documenti cartacei (compreso il loro trasferimento fisico e conservazione negli archivi cartacei tradizionali) alla fase virtuale (condotta attraverso il trasferimento online di documenti elettronici al cloud storage o agli archivi virtuali). In questo contesto, ci sono nuove sfide per quanto riguarda la pratica della valutazione dei documenti e la determinazione del loro periodo di conservazione. I metodi di registrazione, sistematizzazione e valutazione dei documenti, che hanno dimostrato il*

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*loro valore e sono ampiamente utilizzati per lavorare con i documenti cartacei, sono diventati di scarsa utilità per i documenti elettronici e sono soggetti a revisione. Vale anche per i principi di registrazione dei documenti nel processo di gestione, perché nei moderni sistemi elettronici di gestione dei documenti (EDMS) la sistematizzazione dei documenti elettronici in file assume un significato diverso e richiede modifiche al principio della loro descrizione e valutazione. Questo articolo presenta la visione dell'autore su come modernizzare i principi di registrazione dei documenti, nonché determinare e fissare il loro periodo di conservazione nella fase di conservazione dei registri e, di conseguenza, facilitare il processo di valutazione e selezione per il loro trasferimento al conservazione negli archivi.*

*Parole chiave: archiviazione, tenuta dei registri, valutazione, periodo di conservazione, scarto.*

## **NOV PRIŠTUP K SISTEMATIZACIJI DOKUMENTOV ZA DOLOČANJE ROKA HRANE**

### **Povzetek**

*V današnji fazi zaradi širokega prodora informacijskih tehnologij v dokumentologijo in arhivske procese prihaja do dejanskega združevanja faz operativnega dela z dokumenti v evidenci in njihovem ohranjanju ter hrambi v arhivu. Sodobna arhivska hramba dokumentov v večini organizacij doživlja prehod iz faze fizične hrambe papirnih dokumentov (vključno z njihovim fizičnim prenosom in hrambo v tradicionalnih papirnatih arhivih) v virtualno fazo (izvaja se s spletnim prenosom elektronskih dokumentov v shrambo v oblaku ali virtualne arhive). V tem kontekstu se pojavljajo novi izzivi glede prakse vrednotenja dokumentov in določanja rokov njihove hrambe. Metode sistematizacije in vrednotenja dokumentov, ki so se izkazale in se pogosto uporabljajo za delo s papirnimi dokumenti, so postale malo uporabne za elektronske dokumente in so predmet revizij. To velja tudi za načela registracije dokumentov v procesu upravljanja, saj v sodobnih sistemih za upravljanje elektronskih dokumentov (EDMS) sistematizacija elektronskih dokumentov v datoteke dobi drugačen pomen in zahteva spremembe v principu njihovega opisa in vrednotenja. Prispevek predstavlja avtorjevo vizijo o tem, kako posodobiti načela evidentiranja dokumentov ter določanja in določanja njihovega roka hrambe v fazi vodenja evidence ter posledično olajšati proces njihovega vrednotenja in selekcije za prenos v hrambo v arhivu.*

*Ključne besede: arhiviranje, evidenca, vrednotenje, rok hrambe, dispozicija.*

## INTRODUCTION

The issues of registration and systematization of documents created on traditional media including paper, magnetic tapes and film, have been fairly well studied. In most of the developed countries there are recommendations for their registration, accounting, use, appraisal, determination of their retention period, disposition and the rules for their transfer to state and departmental archives have been developed. However, when it comes to electronic documents, especially digital born documents, the situation changes dramatically. In the modern world, work with such documents needs regulation, which cannot be developed without realizing that documents created initially in the electronic form are not electronic analogues of traditional documents. Due to the limited size of this paper we will discuss only managerial documents as the most massive and widely used ones. At the same time, we will consider them both on traditional (paper) and on modern (digital) media. To make it clear which documents are discussed in this paper, I propose to take the following classification scheme as a basis:

- document - a generic concept that includes all types of documents on all media;
- paper document (p-document) - a document created on traditional paper media;
- electronic document (e-document) - a document created or used in the electronic form after transformation (e.g. digitization);
- digital born document (db-document) - an electronic document originally created on a digital medium, used in EDM systems and transferred to the archive exclusively in this form.

Having been involved in research into terminology (including that of ISO)<sup>2</sup>, for many years, the author is aware of the superficial character of the definitions of these terms (Varlamova et al., 2017; Varlamova et al., 2019), but this approach will make it possible to present our considerations, focusing on the importance of the document type (based on the type of media on which it was created) within different approaches to registration, systematization and appraisal of documents.

## TRADITIONAL APPROACH TO REGISTRATION AND SYSTEMATIZATION OF DOCUMENTS AND ANALYSIS OF THE FEASIBILITY OF ITS APPLICATION TO DIGITAL BORN DOCUMENTS

Basically, all the recommendations regarding paper managerial documents come down to the fact that in the current office work they are registered and stitched into files, in accordance with the organization's File Register, which contains the information on the terms of their retention. After the expiration of the retention period an examination of the documents' value is carried out and the documents of the files are appraisal, irrelevant documents that are not subject to retention are extracted, and those that remain are transferred to the archive, for which an inventory of the transfer of these files to the archive is drawn up. Thus, there is a well-developed algorithm for working with p-documents in recordkeeping, based on a number of rules:

<sup>2</sup> All the specifics of understanding the ISO terminology used in document and archive management are reflected in specialized English-Russian dictionaries:

- Varlamova L.V., Bayn L.S. & Bastrikova K.A. (2017) *Records Management: English-Russian Annotated Dictionary of Standardized Terminology*. Moscow, RF. 397 pp.
- Varlamova L.V., Bayn L.S. & Bastrikova K.A. (2019) *Records and Archives Management: English-Russian Dictionary of Standardized Terminology*. Moscow, RF. 513 pp.

1. Organizing the p-documents into files with the aim of streamlining them in recordkeeping and facilitating their search. At the same time, p-documents of the same type (or subtype) are formed into files (for example, orders or correspondence) so as to systematize them, facilitate their search by means of consecutive numbering of p-documents within each file.
2. Files are assigned numbers from the organization's File Register in order to assign each file to a particular structural unit of the organization in which these p-documents are created or used (executed). For p-documents, the file is also a way to ensure their safety due to the dense, light-impermeable cover.
3. The retention periods for files are taken from a special retention and disposition schedule of p-documents that sets the retention periods for the purpose of establishing the optimal retention time for files. In this case, the retention periods are assigned to the file as a whole, and not to each document separately.

This algorithm of procedures is regulated by a number of normative acts that are typical for all organizations<sup>3</sup>.

These normative acts are developed by each organization independently on the basis of a number of State normative documents (acts) that are binding on government structures and, as a rule, are used by commercial organizations as well (Federal Archival Agency of Russian Federation & VNIIDAD, 2020, 2019, 2018, 2009, 2005)<sup>4</sup>.

All these regulations, initially focused on working with paper managerial documents, are in the process of being adapted to work with electronic managerial documents. This approach is based on the principle that a document remains as such regardless of its medium (paper or electronic). Not trying to reject this principle and bearing in mind that the idea of creating and saving a document really does not depend on what medium it was created on, we will nevertheless try to consider the reasons why it is not always advisable to apply traditional and well-proven methods of systematizing, registration, disposition and appraisal of p-documents to their electronic counterparts even at the level of recordkeeping.

When the documents arrive at the archive, there, in fact, the connection between the elements of the unified documentation fund of the organization is broken, because the documents are divided into archival (transferred to the archive) and operational (remaining in the recordkeeping). This is due to the fact that the archive compiles its own

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3 They are:

- Instructions for the Organization's Recordkeeping, regulating the procedure for the creation and use of documents;
- the organization's File Register, the reflecting the structure of the organization and regulating the belonging of the files to a certain structural unit, as well as the retention periods of the files;
- the State Retention Schedule of Documents (typical and departmental), indicating their retention period;
- the procedures (instructions) for the appraisal of documents and the transfer of files to the archive of the organization or departmental archive.

4 Among them are:

- Rules of Recordkeeping in State Bodies, Local Authorities and Government Organizations;
- Standard Instructions for Recordkeeping for Federal Executive Bodies;
- Methodological Recommendations for Drawing up Instructions for Recordkeeping in Federal Executive Bodies;
- Methodological Recommendations for the Development of File Register Templates;
- Schedule of Typical Archival Managerial Documents Generated in the Course of the Activities of State Bodies, Local Authorities and Organizations, Determining their Retention Period;
- Rules for the Organization of Storage, Acquisition, Accounting and Use of Documents from the Archive Fond of the Russian Federation and of other Archival Documents in State Bodies, Local Authorities and Organizations, etc.

recording documents and assigns a new archival index to the files, which does not coincide with the organization's File Register.

As regards the efficiency of organizing document flow (hereinafter the docflow) and archival storage, these approaches are mostly correct, since they make it possible to filter out unnecessary documents or their copies, form the archival fond of the organization and minimize the composition of preserved p-documents. All this allows reducing the cost of documents' storage and ensuring their safety (both physical and informational).

This is also justified in terms of the convenience of creating and using registration forms, since it is impossible to create universal forms convenient for use in recordkeeping and archives because of the specifics of p-documents and the established archival practice of registration/accounting and systematization of the documents' fond over the years. This process also has some weak points due to the possibility of bias in the appraisal and that of a possible "accidental" destruction of certain documents without leaving traces about who and why did it, as the shelf life of value expertise certificates is relatively short.

It is really possible to destroy the necessary documents accidentally if their retention period has expired (according to the File Register) and it is almost impossible to check the repeatability of the information contained in them because of the volume of paper docflow and the multiformity of its registration forms. It is impossible to determine the retention period for each p-document due to the specifics of the system of retention and disposition schedule (typical and departmental), which, as a rule, contain standard types (subtypes) of documents and require special knowledge.

Therefore, the questions to consider are:

1. Are all the aspects and methods of the tradition of paper recordkeeping and archival storage fully applicable when working with db- documents?
2. Is it possible to keep a single and indivisible documentary fond of an organization with uniform rules for db-documents' registration and systematization?
3. Is it possible to do without forming files and to base the registration system solely on db-documents?
4. Is the retention and disposition schedule of typical documents with the indication of their retention period sufficient at the present stage, or should they be transformed for db-documents?
5. Is there any difference in the appraisal between paper and db-documents?

We will try to answer these and other questions in this paper.

Based on the foregoing, we can see that the systematization of documents both in recordkeeping and in archives involves organization of files. By assigning a registration number to a p-document (usually sequence number, increasing throughout the year), the recordkeeper inserts into it the index of the file this document will relate to. The file index is taken from the organization's File Register, closely related to the structure of the organization. Thus, initially the document is placed in a file for the purpose of accounting and facilitating its search.

Thus, not having electronic means of information retrieval and maintaining a paper-based way of registering documents, such a detailed system of registration number (index) of an incoming documents made it possible to quickly find it manually by flipping through the register of incoming documents, having minimal information about it (for example, knowing where it came from). At the same time, this approach was not always convenient if the work on the received p-documents required the involvement of several structural divisions of the organization, and the question arose in which of them the



original of this p-documents should be stored. In most cases, the original of the p-documents remained in the administrative department, and its copies were transferred to all the chiefs of structural divisions of the organization, indicated in the resolution. Thus, the volume of paper docflow increased significantly. Of course, during the appraisal of the p-documents transferred to the archive these copies were deleted, but the availability of the original was not always checked, and in the case of the organization with poorly organized recordkeeping there was a risk of losing the original document.

Within any electronic documents management system (hereinafter the EDMS), e-document are also recorded by the registration number of the document, the only difference is that, due to the capabilities of modern EDMS, an e-document can be searched for by its content or keywords, and there is no need for such a detailed elaboration of the registration number. Moreover, with a well-developed system for identifying incoming documents, the formation of an incoming number and filling in a document's card occurs automatically due to the fact that the entire complex of classifiers is initially included in the EDMS.

At the same time, the problem of copying the documents has also been resolved, since any authorized person can have access to the e-documents, and the original of the e-documents is stored in the system a priori, if the organization uses exclusively electronic docflow.

Thus, speaking about electronic managerial documents, we can see that at the level of their registration, the established practice of working with their paper analogs seems redundant and should be simplified in terms of the formation of an incoming (as well as outgoing) registration number, one of the functions of which was to attach the db-documents to a particular file.

However, we can observe a tendency to keep the systematization of db-documents into files, even when using the EDMS. But how appropriate is it?

In the EDMS, registration of db-documents (incoming, outgoing, internal) is done individually, i.e. each db-document is assigned a unique identifier (registration number, index), which the db-document retains throughout its entire life cycle in recordkeeping and which can be saved when transferring these db-documents to archival storage. Due to the fact that all EDMSs regularly (daily, weekly, monthly, annually) form registration lists (register) of el-documents (separately for incoming, outgoing and internal), it turns out that when conducting an appraisal of db-documents in these registration forms, necessary data can be entered: the decision to destroy the db-document or transfer it to the archive; information about appraisal; number of the archival inventory in which the db-documents is included; the archival index of the db-documents (if it is necessary to maintain a special registration form), etc.

Thus, it will be possible to preserve a unified documentary fond of the organization with uniform rules for db-documents' accounting and their traceability at all stages of their life cycle, including archival storage. This approach will also allow us to exclude the practice of arranging db-documents into files, which, in our opinion, is redundant in relation to electronic document management due to the following:

1. Managerial documents are arranged into files according to the principle of uniformity. Even in the paper docflow this is not always convenient. The fact is that in the course of execution of a managerial document, a whole complex of related documents is formed, which are distributed into other files or form a separate file. But in either case, the integrity of the documentary fixation of the process of execution of a managerial document is disturbed. In the conditions of electronic docflow this can be avoided, because the e-document in the EDMS is virtual and is literally "collected" at

the user's request. Therefore, the creation of files seems to be rather an artificial and unnecessary activity, since it is possible to make a basing on the user's request according to specified parameters. Since these requests may be different and the volume of the requested db-documents will be different as well, there is no need to create any files at all, since they can contain the documents' duplicates (copies). This happens quite often in paper docflow and makes it difficult to carry out an appraisal.

2. The practice of creating a file of documents requires the development of special registration forms for files. In paper recordkeeping this function is partly performed by the File Register, and when they (documents) are transferred to the archive, by the inventories. When maintaining documents in recordkeeping and their continuity in the archive, the need to create special register forms for files disappears. The only exception are files of special purpose: legal cases, investment cases, etc., i.e. cases requiring legal certification of their completeness and their containing all necessary documents. But as a rule, in Russia, they are made on paper or in mixed form (hybrid files), due to imperfect technology and legislation.
3. When creating files within any managerial process, the documents included into them have different retention periods. In this case, the file in the File Register is assigned a maximum retention period based on the documents in the file. Thus, a file may contain documents with expired retention periods, as it is impossible to reorganize the files in recordkeeping. In case of db-documents' registration this problem will be solved as well, since the retention period will be assigned to specific db-documents, and not to the file as a whole.

Here we have come to a very important point – appraisal and determining the db-documents' retention period.

## **THE TRADITIONAL APPROACH TO THE APPRAISAL AND DETERMINING THE RETENTION PERIOD OF DOCUMENTS AND THE WAYS OF THEIR TRANSFORMATION**

In Russia as well as in many other countries the retention periods for documents are specified in the retention schedule generated according to documentation systems. For example, in Russia the "Schedule of Typical Archival Managerial Documents Generated in the Course of the Activities of State Bodies, Local Authorities and Organizations, Determining their Retention Period" (2020)<sup>5</sup> (hereinafter the Retention Schedule) is the most demanded State typical retention and disposition schedule which contains the retention periods of the most common types and subtypes of managerial documents, combined into standard groups.

This Retention Schedule has a ranking structure, because the retention period of the document of the primary organization that is not included in the schedule of organizations - contributors to the State Archival Fond (for example, orders) will usually be lower than the retention period of a similar document of a higher organization, which is a contributor to the Archival Fond of the Russian Federation.

Therefore, the same type of documents can have different retention periods, depending on the organization in which this document was created. Besides, the retention period is assigned not to a specific document, but to the type or subtype of documents, in close connection with the documentation system in which it is formed.

At the same time, practically all government agencies (i.e. ministries) have their own Departmental Retention Schedules of documents specifying their retention periods,

<sup>5</sup> This Retention Schedule was created in the USSR and is regularly updated in modern Russia.

because special documentation systems are created there. For example, the Ministry of Justice has the legal documentation system, Ministry of Taxes and Duties has the tax documentation system, etc. As a rule, retention periods are indicated in their schedules in relation to a specific type or subtype of documents that are formed within the implementation of a specific function. In both cases, the type of document is an universal, but its subtypes are different, as well as their retention periods.

Thus, the appraisal and retention periods are determined by the organization on the basis of the retention and disposition schedules and can be related both to the standard type of document and to its particular subtype. Therefore, documents arranged in the file may have different retention periods. When arranging p-documents into file, this problem is obvious and creates additional inconveniences when carrying out an appraisal and organizing the storage of documents.

When conducting electronic docflow, this situation can be changed by setting the retention period for each type and subtype of e-documents separately and while entering these documents into the system, taking into account the requirements of the regulatory framework. Technically, this is not difficult, since it requires only an additional area in the EDMS registration form. The problem arises while determining the retention period for a specific db-documents, because in the Retention Schedules the types and subtypes of p-documents are grouped into clauses, formed according to the principle of belonging to the function either of management or of production, and within it according to the type of documents. Thus, in order to relate the shelf life to a specific type (subtype) of document, it is necessary to be expert in the documentation systems, management and/or production processes implemented within the activities of the entire organization.

Another option is to use alphabetical indexes of the types and subtypes of documents included in the Retention Schedule. But in both of these cases, we will not find at least 25% of the types of e-documents, since with the introduction of IT the document management process has been substantially simplified and it is often easier to create a new form of db-document (i.e. increase the number of its subtypes) so as to solve a specific managerial or production problem rather than use the available ones for a number of reasons. In fact, not all organizations keep holders with unified forms of their documents (even managerial) in principle and have their templates in the digital form or just units in XML formats. That is why it is easier to develop a new form for a specific task, but as a rule, few people care about what file to put the documents into and what retention period it should be assigned.

All these considerations led the author to the idea of the need to change the very approach to registration and systematization of db-documents and to give up the practice of arranging them into files, at the same time, gradually reducing the practice of developing retention and disposition schedule of documents with an indication of their retention period, since they are only effective for p-documents.

The outcome could be the "Register of Types and Subtypes of Documents Formed in State Bodies and Determining their Retention Period" (hereinafter the Register), created as a State Information System. It should be noted that the idea of the Register was presented by a team of authors (Afanasyeva L. P., Muravyova N. A., etc.) under the leadership of the paper's author (as the vice-director of VNIIDAD and the head of the theme) within the framework of topic of the VNIIDAD's Research Plan in 2019, but has not been implemented yet at the state level<sup>6</sup>.

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6 VNIIDAD (2019) *The Concept of the Register of Types and Subtypes of Documents Formed in State Bodies and Determining their Retention Period*. Moscow, RF: <https://vniidad.ru/wp-content/uploads/2021/02/План%20НИОКР%20на%202019.pdf>

At the same time, the analogue of the Register was introduced by the author in a number of large Russian commercial companies with a ramified structure that are not compilers of the Archival Fond of RF (which made it possible to give up the practice of forming documents into files, having developed our own schemes for classifying documents, assessing them and determining their retention period) and has shown its effectiveness. However, the completeness of the functionality of the Register can be realized only in the context of its implementation as a State Information System.

## **A NEW APPROACH TO SYSTEMATIZING AND APPRAISAL OF DB-DOCUMENTS FOR FIXING THEIR RETENTION PERIODS**

Any state information system is necessary for the implementation of the functions of the authorities (state bodies, federal executive bodies), as well as for organizing the exchange of data both between state bodies themselves, and between the latter and non-state organizations, on issues within the competence of the former.

In order to realize this idea, it must be divided into components and start with managerial documentation systems as the most widespread and still the most unified ones owing to extensive scientific and practical developments of Main Archival Administration and VNIIDAD (1971–1973, 1991) made during the USSR period<sup>7</sup>. Although the author relies on the experience of Russia and focuses on national practice, this idea might be useful to other countries as well, because it is universal. At the same time, the idea should be implemented simultaneously in all structures (starting with the higher bodies, federal executive bodies) to ensure the continuity of forms of documents' types and subtypes, administration procedures and consistency of the EDMS classifiers of organizations participating in the Register.

When the State Information System "Register of Types and Subtypes of Documents Formed in State Bodies and Determining their Retention Period" is created, the participating authorities (state bodies, federal executive bodies) will have to:

- conduct an audit of the documentation systems used in government bodies and identify all types (subtypes) of documents used by the latter at present;
- identify by which regulatory enactments these types (subtypes) of documents were introduced and within which business process as well as in what formats they are used;
- create a list of normative acts that introduced the forms of documents for special documentation systems (medical, tax, customs, etc.) that are not presented in the retention and disposition schedule (typical and departmental);
- compare the selected types (subtypes) of documents with each other, unify them (reducing their quantity and improving their quality) and recommend the formats for their creation-use-preservation;
- create a unified classifier of types (subtypes) of documents for each of the documentation systems and apply it in EDMSs used in government bodies;
- develop (update) the forms in XML for each type (subtype) of the document;
- establish (specify) and fix the retention period for each type (subtype) of the document;

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<sup>7</sup> There are:

- Council of Ministers of the USSR, Main Archival Administration/VNIIDAD, GOSSTANDARD (1971–1973). *Unified State Recordkeeping System*. Moscow, USSR: Publishing House of Standards.
- Main Archival Administration of the USSR & VNIIDAD (1991). *State System of Documentation Support of Management (Basic Provisions and General Requirements for Services of Documentation Support of Management)*. Moscow, USSR: Publishing House of Standards.

- modernize the practice of coordinating the retention period of newly formed types (subtypes) of documents with the government body responsible for archiving;
- systematize the practice of creating new types (subtypes) of documents by government bodies and take control of the former by including newly formed types (subtypes) of documents in the Register.

The State Information System "Register of Types and Subtypes of Documents Formed in State Bodies and Determining their Retention Period" could greatly simplify the work of commercial organizations, which would allow using the Register as a paid state information resource for a number of parameters:

- a database of types and subtypes of documents' form will facilitate the search for the required form and minimize the process of creating new varieties of documents, because it will optimize the process of documents' creation;
- a database of formats, their electronic templates and XML-schemas of documents will make redundant the work on their development and approval, because it will allow using ready-made forms;
- a database on the retention periods of types and subtypes of documents will facilitate the search for these periods and lead to the fulfillment of state requirements for the formation of File Registers of organizations (if these requirements are still actual) and the preservation of the organization's documentary fond.

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## SUMMARY

*The issues of registration and systematization of types and subtypes of digital born documents (db-documents), as well as the methodology for appraisal and determining their retention period, are of fundamental importance for the preservation of the organization's documentary fond and, as a consequence, of the historical heritage of the state and society. The methodology of these processes, well developed and successfully used for decades to produce paper documents (p-documents), is not always suitable for electronic documents, especially those digital born.*

*The author proposes a new approach to the processes of accounting, systematization, appraisal and determination of the retention periods of these documents, based on the scientific theme the Concept of the "Register of Types and Subtypes of Documents Formed in State Bodies and Determining of their Retention Period" (hereinafter the Register) which was developed under her supervision in VNIIDAD (2019). Nevertheless, it was implemented by the author as a private project at one of the largest commercial enterprises and has shown its effectiveness and feasibility. This experience allows the author to hope that over the time the Register, introduced at the state level, will:*

- *change the approach to both the registration and systematization of db-documents in the EDMS, making the creation of files a rare process;*
- *make the organizations' file register an accessory (and sometimes unnecessary) db-document, since it will allow the development of detailed and consistent classifiers of types and subtypes of db-documents easily used in the EDMS;*
- *reduce the role of (and perhaps cancel the need for) the retention and disposition schedule of db-documents with an indication of their retention period, since the Register data will always be more updated and relevant;*
- *lead to a change in the practice of appraisal of documents and to a rise in the responsibility of officials for the disposal of db-documents, as that will make it possible to record in registration forms all the arguments for making this decision, as well as to save metadata about the destroyed document.*

*In this case, the registration number (index) of the db-document assigned to it when it is included into the EDMS (or created in it) will be saved throughout its entire life cycle and will be transferred to the archive of the organization and/or to the departmental archive, which will preserve the continuity of the processes of working with db-docu-*

*ments, a single scheme of its metadata and as a result, it will preserve the consistency of accounting for the organization's documentary fond (operational and archival).*

*Thus, realizing that db-documents are a different entity, and not just a different form of documents' creation, we are on the verge of dramatic changes in their registration, accounting, systematization, appraisal and determination of their retention period, requiring a new methodology and theoretical reconsideration of many familiar processes, so thoroughly elaborated for p-documents.*

*Typology: 1.02 Review article*

Sarvesh Singh<sup>1</sup>

## ARCHIVES AND THE CHALLENGES OF APPRAISAL PRACTICES

### Abstract

*Every records creating agency produces a large body of records but a very few of them are of permanent nature which have historic importance. Only such records should find a place in archives. This requires a careful appraisal of records. There are occasions when non-permanent records of little historic importance are transferred to archives. This creates a problem for an Archivist. All such records are required to be returned to the originating department or agency. In India most of the records are transferring directly by the creating agency / department to the archives according to the retention / preservation schedule. Sometimes observed that records may be worth keeping even it does not provide the best evidence. It needs to define criteria for selecting the best one which may have best evidence, historical and legal value by applying best appraisal practices. For that Archivist might consider sampling, weeding and culling when faces with large volumes of archives.*

*Key words: Appraisal, records, archivist, archives.*

## GLI ARCHIVI E LE SFIDE DELLE PRATICHE DI VALUTAZIONE

### Sintesi

*Ogni agenzia di creazione di documenti produce un ampio corpus di documenti, ma pochissimi di essi sono di natura permanente e di importanza storica. Solo tali record dovrebbero trovare un posto negli archivi. Ciò richiede un'attenta valutazione dei record. Ci sono occasioni in cui documenti non permanenti di scarsa importanza storica vengono trasferiti negli archivi. Questo crea un problema per un archivista. Tutti questi documenti devono essere restituiti al dipartimento o all'agenzia di origine. In India la maggior parte dei documenti viene trasferita direttamente dall'agenzia/dipartimento di creazione agli archivi secondo il programma di conservazione/conservazione. A volte è stato osservato che può valere la pena conservare i registri anche se non forniscono le prove migliori. Deve definire i criteri per selezionare quello migliore che può avere la migliore evidenza, valore storico e legale applicando le migliori pratiche di valutazione. Per questo l'archivista potrebbe prendere in considerazione il campionamento, il diserbo e l'abbattimento quando si trova di fronte a grandi volumi di archivi.*

*Parole chiave: valutazione, record, archivista, archivi.*

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## ARHIVI IN IZZIVI VREDNOTENJA

### **Povzetek**

*Vsak ustvarjalec pri poslovanju ustvari veliko količino zapisov, vendar je zelo malo od njih trajne narave z zgodovinskim pomenom; samo takšni zapisi naj najdejo prostor v arhivih, kar pa zahteva skrbno oceno zapisov. Obstajajo primeri, ko se netrajni dokumenti majhnega zgodovinskega pomena prenesejo v arhiv, kar ustvarja težave za arhivista. Vse take zapise je potrebno vrniti izvirnemu ustvarjalcu. V Indiji večino gradiva v arhiv neposredno prinese ustvarjalec, skladno s klasifikacijskim načrtom. Včasih opažamo, da je morda vredno voditi evidence, čeprav ne zagotavljajo najboljših dokazov. Določiti je potrebno merila za izbiro tistega gradiva, ki ima zgodovinsko in pravno vrednost, z uporabo najboljših praks vrednotenja. Arhivist bi lahko razmislil o vzorčenju in izločitvi, ko se sooča z velikimi količinami gradiva.*

*Ključne besede: vrednotenje, evidence, arhivist, arhivi*

## INTRODUCTION

Appraisal is a process of complex analysis fundamental to all archival operations. Appraisal consists of a series of analytical questions asked during a sequence of events at all levels of the archival process. This paper will describe issues surrounding appraisal decisions for records, including specific strategies, challenges and factors for consideration and levels of appraisal (Hackman & Warnow-Blewett, 1987). Special attention will be paid to appraising complex records, with the intent of providing recommendations for records of continuing value that require permanent retention and those that may be disposed. Developing clear and consistent appraisal guidelines for collections is extremely critical due to the nature, and often quantity, of the records they contain (Samuels, 1986).

Archival theory and practice has provided a number of appraisal approaches. One of these includes developing a documentation strategy (Schrock, 1987) an integrated process in which records managers, keepers, and users develop and implement appraisal frameworks for collecting within defined subject areas. There are also the traditional appraisal considerations of evidential, informational, and intrinsic value. In the SAA appraisal manual, F. Gerald Ham defines the five basic tools for the evaluation of records to determine permanent value as functional analysis, content analysis, context analysis, use analysis, and cost-benefit analysis (Ham, 1992). Other approaches to appraisal include applying the concept of continuing use within the framework of primary and secondary use, or assessing records in terms of their value as documentation, or for potential use, or artifactual significance.

Appraisal is not an exact science. For design practices, institutional archives, and other archival repositories, the most difficult appraisal activity is determining which records are worthy of permanent retention and which can be transferred or discarded (Singh, 2016). The enormous quantities of modern records and modern design records mandate effective and fearless appraisal. According to Robert Desaulniers, "In selecting records [for permanent retention] it is necessary to take account of the relative value of the various professional practices they document as well as the scale, quality, impact on the built environment, research and innovation, and degree of influence, of the buildings and facilities they record" (Lowell & Tawny, 2006).

## METHODOLOGY

For archival repositories, appraisal naturally begins at the collection level. It is important to have a clear mission for your repository and to keep this in the forefront of your collection development practice. Appraisals must be conducted and documented by a qualified appraiser at macrolevel (Cook, 2004).

## STEPS INVOLVES

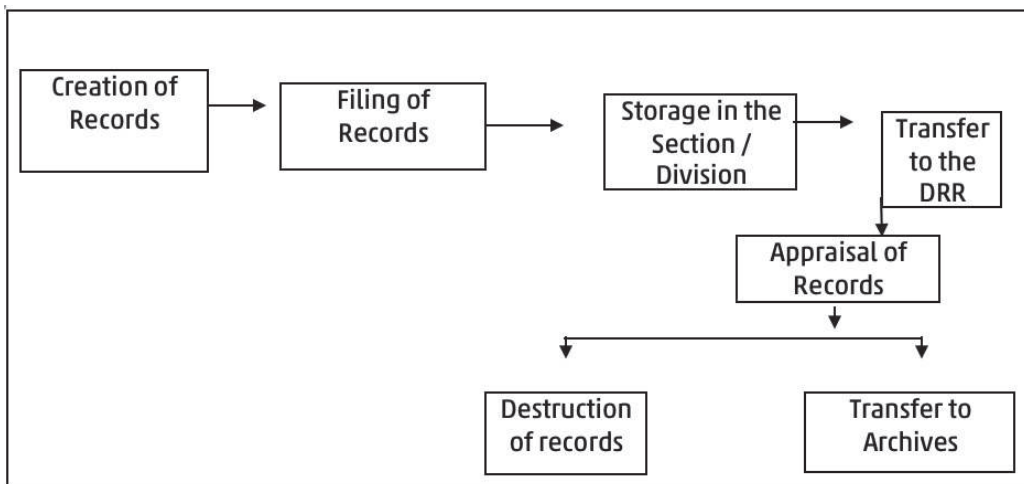
- (i) The process of appraisal has to be extremely cautious, as records are unique and have no duplicates. If destroyed carelessly, it would mean permanent loss to both the administrators and the research scholars. The appraisal standards, however, cannot be precise or definite. They could only provide appraiser with guidelines, which could be applied with discretion. It obviously means that this work could be conducted by persons of sufficient maturity and experience, as records with passage of time acquire values, which are unimaginable while they are current. Wholesale destruction of records for creating some space in the office need not be pursued vigorously, as it is advantageous to retain the end products of such records.

- (ii) Records are to be appraised after taking into consideration the significance of the records creating body, its position in official hierarchy, nature of its activities and relations of its activities with those of superior or subordinate administrative units. Besides, acquaintance with the nature of series of records demanding appraisal would be and understanding of the organizational history of the agency whose records are subjected to appraisal would be desirable.
- (iii) Appraisal process should commence immediately at the time of closing of files and be conducted before the transaction dealt in them have completely faded from the memory. Files which are of permanent nature at the time of recording should not be subject to review or appraisal at this stage. Files coming up for review at this stage would be files relating to house-keeping and establishment matters. The process would become simple and easy if the files are appraised purely from the administrative angle. Before commencing the process of appraisal of files, the appraiser should invariably ask himself a question whether the record under review would be required as precedent or a guide to a possible action, should similar circumstance arise in future. He should not take decision on the basis that the transaction for which the record was created has ceased to exist so the record may be destroyed. Upgrading file from establishment or housekeeping category to record of permanent nature could be decided at this stage.
- (iv) As most of the files about house-keeping and establishment jobs have short-term administrative value, they could be weeded out quickly at this stage. Files which would fall into this category would pertain to routine personnel record, purchase orders, stock control, servicing of equipment and computers, printers, scanners, furniture and stationery. Files dealing with purchase may be destroyed after audit and entries have been made in the stock registers. Files dealing with individual matters can also be weeded out after the purpose in view has been served by them. Similar treatment should be accorded the records of establishment, welfare matters, public relations etc.
- (v) Historical criteria for appraisal can be applied after sufficient time has elapsed since an event or decision on the issue had been taken. As historical research is in no way connected to normal work of the record creating agencies, it would not be proper to leave final appraisal of such files/records to the creating agency alone. They normally have no expertise or actual experience in research, let alone the question of their being aware of conceivable means to forecast with certainty records which future researchers might consider important. It would, therefore, be desirable to associate Archivists with the appraisal process at this stage. Association of the Archivists is also advisable for the reason that they generally come into contact with the research scholars and are aware of what the latter would like to consult. Similarly for appraisal of records relating to science and technology assistance from the experts from the relevant field should be sought to ensure that no important record is lost to future generations.
- (vi) With the passage of time, most records acquire values other than purely administrative. Historians, genealogists and researchers in other fields get interested in them along with administrators for information contained in them. At this stage, files classified as permanent could be looked at with certain amount of objectivity to assess their historical significance. It is, therefore, desirable that they should be subjected to fresh review from the informational value that they might possess. In most of the countries this sort of review is conducted after a file has completed 25 years but keeping in view fragility of paper records a trend towards early review is gaining acceptance.

(vii) Records which are of historical significance and deserve retention for administrative and research purposes would generally deal with enactment of laws, framing of rules and regulations, executive orders relating to creation, organization and re-organisation of offices and departments, establishment matters like recruitment, promotion, retirement, pension etc., interpretation of rules, legal functions and the like. Files pertaining to the title of property, appointment of committees and commissions and their reports, agreements and conventions, public or international events which created great controversy on national scene would merit permanent retention. Papers relating to change of policy are not easy to recognize, yet files containing summary of ministers, appointment of departmental or interdepartmental committees, note for cabinet, instructions to the executive agencies on major policy decisions of administrative, political, economic, and legal and like issues could be preserved for posterity. Files containing unpublished statistical or financial data covering a long period or wide area as also important aspects of scientific or technical research and development could also qualify for permanent retention. Files dealing with the local matters could also be kept provided it is felt that evidence about them would not be available locally. File containing information on obsolete activities or investigations or important schemes which were not executed be retained for posterity. Besides, files containing information of biographical or antiquarian nature should be retained.

Life cycle of record is regarded as tradition approach and appraisal is undertaken at the end of cycle. The records selected of indefinite or permanent retention are identifies and transferred to the archival repository (RBI, 2012). The following chart shows the life cycle of records.

**Chart 1: Life cycle of records**



All records created and / or received in the course of the business shall be managed in accordance with the policy irrespective of their formats or of the media on which they are created.

### CHALLENGES IN APPRAISAL OF RECORDS:

Piggott, an archivist, has identified the following challenges faced in appraisal of records and described it as 'archival appraisal truism' (Piggott, 2012):

- (i) Appraisal is not a science
- (ii) Appraisal is not free from bias and subjectivity
- (iii) Appraisal is the primary archival function on which other functions depend
- (iv) The great trinity mystery – cannot keep all, records have some value, cannot predict future research interest
- (v) Destruction to protect privacy is not appraisal
- (vi) Disposal does not mean perpetual preservation or eventual destruction
- (vii) It is easy to justify keeping but not destruction
- (viii) There is reluctance to copy and destroy
- (ix) Older records are fewer resulting in inclination to keep them.

In view of the above, it can be said that appraisal is not easy work and there are no right or wrong answers. The primary reason why archival appraisal is more complex and far reaching than simply determining what needs to be kept and what not. It is about deciding what will be remembered and what will be forgotten.

For appraisal around the five components are very important for the appraisal information gathering and analysis process (Cook, 2004). These are also challenging for the organisation:-

- (i) Training of Staff
- (ii) Collection of Information before Appraisal or Preparatory Research through office / department visit
- (iii) To Determine the Office Function and Relative Value of the Record
- (iv) The physical examination of selected records according to the retention schedule
- (v) Preparation of Appraisal Report
- (vi) Submission of final Appraisal Report for transferring the selected record to Archives for permanent preservation.

### CONCLUSION

It needs to define criteria for selecting the best one which may have best evidence, historical and legal value by applying best appraisal practices. For that Archivist might consider sampling, weeding and culling when faces with large volumes of archives. Regardless of these challenges, can adopt institutional functional analysis and macro appraisal apply according to the unique circumstances.

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*Typology: 1.04 Professional article*

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## TOWARDS AN APPRAISAL AND SELECTION FRAMEWORK FOR THE DIGITAL RECORDS OF THE AMERICAN UNIVERSITY IN CAIRO (AUC)

### Abstract

*The American University in Cairo (widely known as AUC) with its University Archives and Records Management is currently under the process of developing a framework for the appraisal and selection of digital records (including e-mails and records kept in physical storage media e.g. floppy disks, CDs). The purpose of this paper is to describe the process of the creation of digital appraisal and selection framework for the AUC University Archives. Particularly, it presents what has led the archivists to rethinking their appraisal system concerning digital records, the differences between appraising paper and digital records, the challenges for the appraisal of digital records, and the criteria behind the components of the AUC Archives appraisal and selection framework. The approach used in this research for the creation of the digital appraisal framework, included mapping and assessment of the current AUC's University Archives and Records Management appraisal and acquisition tools, and it was followed by two pilot projects for the acquisition of digital records of a closing university department and of a departure employee from a critical university senior administration office. The pilot projects were useful for understanding of practical challenges during the digital appraisal process. Briefly, the results from the process of designing the digital records appraisal at AUC have shown that the appraisal and selection strategy for digital records are not based merely on content and contextual analysis, but also include factors like media types and file formats, etc.*

**Key words:** Appraisal, American University in Cairo, Floppy disks, Emails, Digital files

## VERSO UN QUADRO DI VALUTAZIONE E SELEZIONE PER I DOCUMENTI DIGITALI DELL'UNIVERSITÀ AMERICANA DEL CAIRO (AUC)

### Sintesi

Gli archivi e la gestione dei documenti dell'Università dell'Università americana del Cairo (ampiamente nota come AUC) sono attualmente in fase di sviluppo di un quadro per la valutazione e la selezione dei record digitali (compresi i messaggi di posta elettronica e i record conservati su supporti fisici di archiviazione, ad esempio floppy disk, CD). Lo scopo di questo lavoro è descrivere il processo di creazione del quadro di valutazione e selezione digitale per gli Archivi di Ateneo dell'AUC. In particolare, presenta ciò che ha portato gli archivisti a ripensare il loro sistema di valutazione per quanto riguarda i record digitali, le differenze tra la valutazione dei record cartacei e digitali, le sfide per la valutazione dei record digitali e i criteri alla base dei componenti del quadro di valutazione e selezione degli archivi dell'AUC. L'approccio seguito per la creazione del quadro

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di valutazione digitale è stato una mappatura e valutazione degli attuali strumenti di valutazione e acquisizione degli archivi di Ateneo e della gestione dei record dell'UAC e due progetti pilota per l'acquisizione di archivi digitali di un dipartimento universitario in chiusura e di un impiegato di partenza da un ufficio amministrativo senior dell'università critica. I progetti pilota sono stati utili per comprendere le sfide pratiche durante il processo di valutazione digitale. In breve, i risultati del processo di progettazione della valutazione dei record digitali presso l'AUC hanno mostrato che la strategia di valutazione e selezione per i record digitali non si basa solo sul contenuto e sull'analisi contestuale, ma include fattori come i tipi di supporto e i formati dei file, ecc.

**Parole chiave:** valutazione, Università americana del Cairo, Floppy disk, Email, File digitali

## VREDNOTENJE IN IZBIRNI OKVIR ZA DIGITALNE ZAPISE AMERISKE UNIVERZE V KAIRU (AUC)

### *Povzetek*

Ameriška univerza v Kairu (bolje znana kot AUC), njen univerzitetni arhiv je trenutno v fazi razvoja okvira za oceno in izbiro digitalnih zapisov (vključno z e-pošto in zapisi, shranjenimi na fizičnih nosilcih za shranjevanje, npr. diskete, CD-ji). Namen prispevka je opisati proces oblikovanja digitalnega vrednotenja in izbirnega okvira za Univerzitetni arhiv AUC. Predvsem predstavlja tisto, kar je arhiviste pripeljalo do ponovnega premisleka o svojem sistemu vrednotenja digitalnih zapisov, razlike med vrednotenjem papirnatih in digitalnih zapisov, izzive za vrednotenje digitalnih zapisov in merila, ki stojijo za komponentami okvira za vrednotenje in selekcijo arhivov AUC. Pristop, ki smo mu sledili pri oblikovanju digitalnega okvira vrednotenja, je vključeval mapiranje in analizo trenutnih orodij za vrednotenje in pridobivanje digitalnih zapisov za univerzitetni arhiv, kot tudi upravljanje dokumentov AUC ter dva pilotna projekta za pridobitev digitalnih zapisov zaključnega letnika univerzitetnega študija. in odhodni uslužbenec iz kritičnega univerzitetnega višjega urada. Pilotni projekti so bili koristni za razumevanje praktičnih izzivov v procesu digitalnega vrednotenja. Na kratko, rezultati postopka oblikovanja vrednotenja digitalnih zapisov na AUC so pokazali, da strategija vrednotenja in izbire digitalnih zapisov ne temelji le na vsebinski in kontekstualni analizi, temveč vključuje dejavnike, kot so vrste medijev in formati datotek itd.

**Ključne besede:** Ocena, Ameriška univerza v Kairu, diskete, e-pošta, digitalne datoteke



## THE AMERICAN UNIVERSITY IN CAIRO (AUC): AN OVERVIEW

The American University in Cairo, widely known as AUC, was born out of the work of the existing American Mission in Egypt, which operated in the region from the mid-1850s. Founding AUC, was the idea of Charles Watson, who grew up in Egypt and was the son of American Protestant missionaries. Watson believed that because in Egypt at that time there were only two universities, there was a need for a third institution, a college and university that prepared boys for further education in Europe or America, while promoting Christian ideals (Humphreys, 2020). For this reason, the establishment of the AUC had initially promoted as the creation of a Christian University in Cairo (A Christian University at Cairo, 1917)

The AUC's doors opened in 1919 and it was located at the heart of Egypt at Cairo's main downtown square – now known as Tahrir Square (see Figure 1).

During the first two decades of AUC's operations, the student body was coming from the lower rungs of the aristocracy and was consisted of students from Greek, Armenian and Jewish communities, who were overrepresented in the student body by the 1980s (Murphy, 1987).



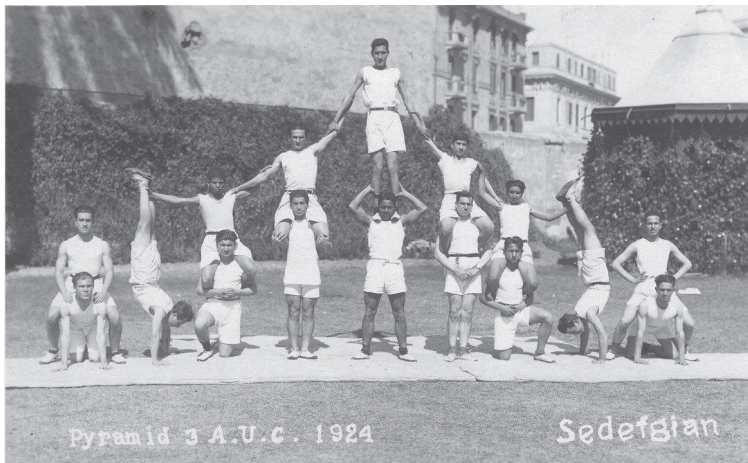
**Figure 1: General View of The American University in Cairo Main Building, Tahrir Campus (The American University in Cairo Rare Books and Special Collections Library, 1920s-1930s)**

AUC in its early years delivered educational innovations to Egypt, from hands-on laboratory work, to the enrollment of a female student in 1928 (Murphy, 1987). Another innovation was college athletics, unknown in Egypt until introduced by AUC in the early 1920s (see Figure 2).

Since the 1950s, the AUC has established concrete relations with the US and Egyptian government, by getting funding from the US, and with Egyptian politicians and US diplomats serving the University from faculty and senior administration positions (Murphy, 1987).

While by the 1980s the student body presented a national and religious variety, today Muslims are overrepresented to the student community. From the 350 students in the 1930s, today the university numbers more than 6000 students, predominantly coming from the Egyptian and Middle East Elite.

Since 2008, the AUC moved to the New Cairo Campus, where it is located until today.



**Figure 2 The American University in Cairo Students in a Pyramid, 1924 (The American University in Cairo University Archives , 1920s)**

## THE AUC UNIVERSITY ARCHIVES

The American University in Cairo University Archives (AUC University Archives) started out its existence as an outsider. In the early 1970s a professor searched for archival sources to support writing a history of the university, and found boxes full of the university's records located to the roof of AUC's main building (Murphy, 1987). The Archives has since grown and found new homes, for several decades in AUC' Rare Books and Special Collections Library in a downtown villa. Since 2010, the AUC University Archives have been housed in the Library building in the New Cairo campus.

The University Archives serves as the official repository for the history and records of the American University in Cairo (The American University in Cairo University Archives, s.d.) Its holdings documenting AUC's history and contributions, serving administrative needs and facilitating research by internal and external scholars. Activities pursued toward these ends, include acquiring, preserving, and providing access to records, publications, oral histories, and other material of historical value. The University archives collects records in any format and structure which document AUC's institutional history and memory, Egyptian and Middle East social, political and educational context, and the US government relations with Egypt.

## DIGITAL ARCHIVING AT THE AUC: A DIGITIZATION UNIVERSE

What is currently considered as digital archiving at the AUC University Archives and what particularly is taken place in practice is the systematic digitization of paper records with cultural and archival value (including architectural drawings, photographs, institutional records, newspapers and magazines) and audiovisual material, mainly slides, tape reels, oral histories recordings and video cassettes. The digitized collections are made available through the Rare Books and Special Collections Digital Library (The American University in Cairo Rare Books and Special Collections Library, s.d.). The digital preservation system is in a very rudimentary stage, without a dedicated digital preservation system and preserving solely digitized collections (on the system the AUC University Archives use for doing digital preservation, see Schmid, 2021). For the archiving of the AUC Web sites, blogs and social media is used the "Archive-it" based on the Internet Archive service (The American University in Cairo, s.d.)

The digitization orientation is clearly reflected to current Archives and Records Management Framework of the University, namely the *University Archives Holding Policy* (The American University in Cairo University Archives, s.d.) and the *Records Retention Plan* (The American University in Cairo University Archives, 2009). Particularly, the two documents stress the importance of the audiovisual material and the focus of the University Archives to the acquisition and digitization of this type of material.

## **TRIGGER FOR A DIGITAL RECORDS APPRAISAL AND SELECTION FRAMEWORK AT AUC**

Very recently, it became obvious that the AUC University Archives have had to start dealing with the born digital material. Primarily institutional new needs place in the center of AUC University Archives' priorities the collection and preservation of born digital records. After the announcement of the new university strategic plan 2018–2022, the university started experiencing a rapid digital transformation, with the growing digitization of its business and academic processes (The American University in Cairo, 2019). In the advent of digitalization of the university, the AUC University Archives considered their tools and processes inadequate to reflect the current reality of the production of continuous increasing volumes of digital information. As a result, the university archivists took a series of actions for the alignment of the AUC University Archives with the digital transformation needs of the university. They created a digital preservation planning, new records management policy and retention schedules, however, the most challenged one was the design of a digital records appraisal and selection framework.

With the paper records, the appraisal and selection process was an easy task. The archives and records management staff took appraisal decisions based on the content of the series of records, had easily access to the centralized filing rooms of university departments and offices, where all semi-active and inactive records are stored, and appraised the paper material directly without the need of equipment.

For the appraisal and selection of the digital records, the AUC University Archives took into consideration other factors such as the needed equipment for the process of the born-digital files or magnetic media, the files formats and the condition of the media, the willingness of the university offices and departments to transfer digital files to the Archives.

As a result, the AUC University Archives proceeded with two pilot projects in two different departments for investigating and defining appraisal and selection criteria for digital records. The AUC University Archives followed a top down approach starting from the context and content analysis in the pilot project one, and moving to a folder and file level analysis in the pilot project two.

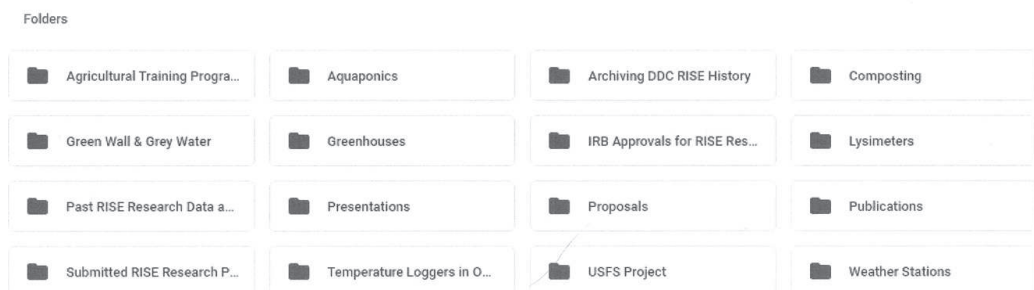
### **PILOT PROJECT ONE: ARCHIVING OF THE RECORDS OF THE DDC/RISE DEPARTMENT**

The pilot project one was about the archiving of both paper and digital records of the Research Institute for a Sustainable Development, known as RISE, which was scheduled to close on May 2019. Many of the records were coming from the period of the RISE predecessor's department, the Desert Development Center or briefly DDC. The time framework for the project was from September 2018 to May 2019.

The majority of the records were in paper format, both publications and documents. For the appraisal and selection of DDC/RISE paper records was established a specific set of criteria based on the needs of the context and content of records of the DDC/RISE. The framework was based on a combination of a context analysis of the DDC/RISE, the records type which were created by the department, the AUC Archives Collection Policy,

the Records Retention Plan and the Library Collection Policy. It was finally established 22 content-based criteria (The American University in Cairo University Archives, 2020).

For the appraisal of the digital records, there was the desire to be used the content-based appraisal criteria, but the question was what digital records it was going to be archived and from whom. So, it was decided to be followed a hierarchy strategy by archiving the digital records of the department's leadership people, namely the records of the DDC/RISE Director who was preparing for retirement at that time and the records of the Head of the Research Unit. The RISE department had also a shared google drive that was archived as well. From the DDC/RISE Director, it was archived his local disk drive and his email account. Particularly, for his email account it was giving to him guidelines to clean up his account from a list of ephemeral and not archival interest material (e.g. personal emails, advertising material, Listservtraffic) (The American University in Cairo University Archives, 2020). From the Head of the Research Unit, it was archived her external hard drive and local disk drive, and the shared google drive of the department, which was the main owner of the account (see Figure 3). The tools were used for the digital archiving was the DataAccessioner<sup>2</sup> (David M. Rubenstein Rare Book & Manuscript Library, s.d.), for migrating the digital records from the department servers and external drives to the AUC University Archives servers, and the ePADD<sup>3</sup> (Stanford University's Special Collections & University Archives, s.d.) for appraising, arranging, describing and preserving, email records. The transfer of digital data from the DDC/RISE to the AUC University Archives was the first acquisition of born digital material and its size was around 48.08GB.



**Figure 3** Research Institute for a Sustainable Development Archived Shared Google Drive, 2019 (The American University in Cairo University Archives, 2019)

## PILOT PROJECT TWO: ARCHIVING OF THE RECORDS OF THE LLT DEAN'S OFFICE

The pilot project two was about the archiving of 43 floppy disks and CDs of the Learning and Library Technologies (LLT) Dean's Office. The time framework for the project was from June 2021 and it is still in progress, with almost half of the material (22 floppy disks and CDs) have been processed so far.

The material was acquired from the Assistant Dean of the Library immediately after her retirement in May 2021. The floppy disks and CDs had been created by the Associate Dean of the LLT and the Library Associate Director in the 1990s. Because the LLT Dean's office was a very important office as a senior management office, it was decided to pro-

2 The DataAccessioner is a free and open source tool developed by the Duke University Rare Book, Manuscripts and Special Collections Library, for migrating data off disks and onto a file server for basic preservation, further appraisal, arrangement and description.

3 The ePADD is a free and open source tool developed by the Stanford Libraries, for supporting the appraisal, processing, preservation, discovery, and delivery of historical email archives.

ceed with a folder and file level analysis, or a “bottom-up” appraisal (for “bottom-up” up digital appraisal, see Sloyan, 2016). For this reason, it was established three main appraisal criteria for selecting files, namely the content, the medium type, the access condition, and the file format condition. Then, it was created an appraisal and selection spreadsheet template for tracking all the relevant information (see Figure 4).

The DROID (Digital Record Object Identification) was employed as a tool for identifying file formats, blank files and dates (The National Archives, s.d.). Although the digital files were old, with the overwhelming majority being in Microsoft Word 97–2003 Document file format, were easily opened and in a good state. In addition, all the CDs and floppy disks were in a very good condition, so all the data was well retrieved and processed.

One of the biggest challenges of the bottom- up appraisal was the file naming. The majority of the files and folders did not have meaningful file names and its was deemed as necessary to go through a file to file analysis for understanding their content. Additional spreadsheets were created for researching and providing explanations of the file names where written in an abbreviation form or without meaningful titles (see Figure 5). Furthermore, the bottom-up appraisal was proved a time-consuming process taking 15 working hours of processing the material, the 22 floppy disks and CDs, with a total data size 7MB.

Medium Type	Medium Type Title	Content (Folders & Files Naming, Content of the Files)	Number of Folders and Files	File Size	Dates	Access Condition of the Medium Type	File formats	File Formats (corrupted or not opened)	Folders For Disposal	Folders for Permanent Preservation
Floppy Disk	FDisk LibraryBudgetMaterial	Library Selectors Appendix, RFPFINAL (Request for proposal for an automated integrated library system)	1 folder, 8 files	1.38MB 21KB 334KB	2000	Good	XLS (MExcel 97 Workbook, v.8), DOC (97-2003)	No	No	Yes
Floppy Disk	FDisk RFPLibraryAutomatedIntegratedSystem	Library Reassessment (current and future salaries planning)	2 files	73KB 446KB	1995	Good	DOC (6.0/95)	No	Yes	No
Floppy Disk	FDisk LibraryReassessment		1 file	37KB	11/10/2003	Good	XLS (MExcel 97 Workbook, v.8)	No	No	Yes

**Figure 4 Library and Learning Technologies Dean’s Office Digital Files Appraisal and Selection Spreadsheet Template, 2021 (The American University in Cairo University Archives, 2021)**

FileName (Original)	FileName(Explanation)
Christiane599	Letter to Christiane on May 1999 from Dean Sahira regarding the retirement of Mary and acquisition topics
CIACCIO	Nicolas Ciaccio, Professor in Sociology, Anthropology and Psychology department who gave to the Library some books as a gift (gift books)
Circ chairs	Request for change of equipment purchase for FY2000
CLIPLEX	Not readable content
COLAPPL	Assistant Director for Collections Management Application (Cover Letter)
COLBUD	COLLECTIONS BUDGET REQUEST Summary
COLCOM2	The Library Collections Committee (Agenda)
COLUPG	Collections Upgrade (memo/email for allocation of money for the purchase of books)
COMPAC	Memo /Letter to the VP for Finance and Administration for the purchase of Compact Shelving

\* Author will provide the title ASAP.

## CONCLUSIONS: TOWARDS A DIGITAL RECORDS APPRAISAL AND SELECTION FRAMEWORK AT AUC UNIVERSITY ARCHIVES

The two projects led to a draft appraisal and selection framework for the digital records of the AUC consisting of four main pillars. The first pillar is a contextual and content analysis of the university functions and records, assessing important for the university administrative, academic and research operations offices and departments, and identifying those offices for acquiring digital material for permanent archival preservation. For instance, it is going to be established a systematic collaboration for the acquisition of digital material from key governing university offices like Office of the Provost, Office of the President, Vice Presidents Offices, Deans' Offices, and other offices with production of significant institutional information, such as Office of Communications, Alumni Office.

The second pillar is to identify those people occupying leadership positions and other key positions across University for getting digital data directly from them. This is mainly an idea coming from the US National Archives and Records Administration (NARA) and specifically the Capstone Approach for archiving the emails of Federal Agencies. According to the Capstone Approach, the NARA archive the emails of senior officials of the US Federal Agencies (White Paper on The Capstone Approach and Capstone GRS, 2015). The university archivists think to use Capstone not only for email accounts but also for other digital records kept by university personnel in leading positions.

The third pillar is the media type (e.g. floppy disks, CD/DVDs, external hard drives). The assessment should take in place for the condition of the medial type, whether it can be opened or not, and the resources, equipment and expertise needed for the processing of some media types like microcassettes.

To conclude, the final pillar is the file formats. Many US universities and other archival institutions around the world have established rule of accepted file formats for transferring to archives. The next step is the assessing of the condition of the files formats, particularly whether there are the expertise and equipment to open or restore some obsolete file formats.

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*Typology: 1.04 Professional article*

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## DETERMINATION OF RECORDS FOR PERMANENT PRESERVATION IN LEGAL ACTS OF EU AND EU MEMBER STATES

### Abstract

*We divide legal and other acts of European Union (EU) concerning the retention of documents into two large groups, namely those dealing with documents of the European institutions and those concerning the Member States. In the first group only Council Regulation (EEC, EURATOM) no. 354/83 on the opening to the public of the archives of the European Economic Community and the European Atomic Energy Community from 1983 contains the provision that refers to the appraisal of records. In the second group, no legal act deals with the selection of documents for permanent storage, nor does a recommendation or resolution.*

*The Slovenian law in force has a basic provision for the evaluation of records in the very definition of archival records, and the second part in the article that determines the method of determination of records for permanent storage. A comparison with the archives of individual EU Member States invites us to revitalize and continue the work started by the Council Resolution on the Archives of the Member States in 2005. Archives not only serve culture but are fundamental institutions that enable the rule of law and the protection of human rights - the fundamental values of the EU.*

**Key words:** archival legislation, EU member states, EU institutions, Archives, EU legal and other acts, archives, records

## DETERMINAZIONE DEI DOCUMENTI PER LA CONSERVAZIONE PERMANENTE NEGLI ATTI GIURIDICI DELL'UE E DEGLI STATI MEMBRI DELL'UNIONE EUROPEA

### Sintesi

*Dividiamo gli atti giuridici e altri atti relativi alla conservazione di documenti in due grandi gruppi, vale a dire quelli che si occupano di documenti delle istituzioni europee e quelli riguardanti gli Stati membri. Nel primo gruppo solo il Regolamento del Consiglio (CEE, EURATOM) n. 354/83 sull'apertura al pubblico degli archivi della Comunità Economica Europea e della Comunità Europea dell'Energia Atomica dal 1983 contiene la disposizione che si riferisce alla valutazione degli atti. Nel secondo gruppo, nessun atto giuridico si occupa della selezione dei documenti per la conservazione permanente, né una raccomandazione o risoluzione. La normativa slovena in vigore ha una disposizione di base per la valutazione degli atti nella definizione stessa di atti archivistici, e il secondo parte dell'articolo che determina il metodo di determinazione delle registrazioni per la conservazione permanente. Il confronto con gli archivi dei singoli Stati membri*

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*dell'UE invita a rivitalizzare e continuare il lavoro avviato dalla Risoluzione del Consiglio sugli archivi degli Stati membri nel 2005. Gli archivi non sono solo al servizio della cultura, ma sono istituzioni fondamentali che consentono lo stato di diritto e la protezione dei diritti umani - i valori fondamentali dell'UE.*

*Parole chiave: legislazione sugli archivi, Stati membri dell'UE, istituzioni dell'UE, archivi, atti giuridici e altri atti dell'UE, archivi, registri*

## DOLOČITEV DOKUMENTOV ZA TRAJNO HRAMBO V PRAVNIH AKTIH EU IN DRŽAV ČLANIC

### Izvleček

*Pravne in druge akte Evropske unije (EU), ki zadevajo hrambo dokumentov razdelimo na dve veliki skupini in sicer na tiste, ki imajo za predmet dokumente evropskih institucij in one, ki zadevajo države članice. V prvi skupini ima določbo, ki se dotika vrednotenja dokumentov le Uredba Sveta (EGS, EURATOM) št. 354/83 o odpiranju za javnost arhivskega gradiva Evropske gospodarske skupnosti in Evropske skupnosti za atomsko energijo iz davnega leta 1983. V drugi skupini se z odbiranjem dokumentov za trajno hrambo ne ukvarja noben pravni akt pa tudi ne priporočilo niti resolucija.*

*Slovenski veljavni zakon ima temeljno določbo evalvacije dokumentarnega gradiva že v sami definiciji arhivskega gradiva, drugi del pa v členu, ki določa način določitve dokumentov za trajno hrambo. Primerjava z arhivsko zakonodajo posameznih držav članic EU nas vabi, da oživimo in nadaljujemo delo, ki ga je začela Resolucija Sveta o arhivih držav članic leta 2003 (Council Resolution of 6 May 2003 on archives in the Member States (2003/C 113/02)). Arhivi namreč ne služijo le kulturi temveč sodijo k temeljnim institucijam, ki omogočajo vladavino prava in varstvo človekovih pravic – temeljnim vrednotam EU.*

**Ključne besede:** arhivska zakonodaja, države članice EU, institucije EU, arhivi, pravni in drugi akti EU, arhivsko gradivo, dokumentarno gradivo

## 1. UVOD

Ovrednotenje dokumentarnega gradiva, ocena, ali ima dokumentarno gradivo zadostno vrednost, da ga določimo kot arhivsko gradivo, je eden temeljnih in najusodnejših postopkov arhiviranja. Le dobra evaluacija dokumentov bo omogočila, da se bodo ohranili pomembni dokumenti, ki bodo služili raziskovalcem, a tudi ustvarjalcem dokumentov, stroki in zaščiti pravic.

V našem prispevku bomo pogledali v pravne akte, ki doseženo oziroma uveljavljeno prakso na področju vrednotenja dokumentarnega gradiva dvigajo v obveznost.

Posebno pozornost torej moramo nameniti izboru tistih elementov v zakonodaji EU oziroma držav članic, ki nam pomagajo odkriti temeljno usmeritev ocenjevanja dokumentov. To so predvsem definicije arhivskega gradiva ter način oziroma postopek določanja tega gradiva oziroma načina odbiranja oziroma sortiranja dokumentarnega gradiva.

Ob tem moramo posebej izpostaviti, da je doba digitalizacije temeljito posegla v arhivsko teorijo in prakso.

## 2. PRAVNI AKTI EU, KI ZADEVAJO HRAMBO DOKUMENTOV

Pravne in druge akte Evropske unije, ki zadevajo arhivsko gradivo, razdelimo na dve veliki skupini in sicer na tiste, ki imajo za predmet dokumente evropskih institucij in tiste, ki zadevajo države članice.

### A.

V prvo skupino sodijo: Uredba Sveta (EGS, EURATOM) št. 354/83 z dne 1. februarja 1983 o odpiranju za javnost arhivskega gradiva Evropske gospodarske skupnosti in Evropske skupnosti za atomsko energijo (Council Regulation, 1983); Uredba Evropskega parlamenta in Sveta (ES) št. 1049/2001 z dne 30. maja 2001 o dostopu javnosti do dokumentov Evropskega parlamenta, Sveta in Komisije (Council Regulation, 2001); Uredba Sveta (ES, Euratom) št. 1700/2003 z dne 22. septembra 2003 o spremembah Uredbe (EGS, Euratom) št. 354/83 v zvezi z odprtjem zgodovinskih arhivov Evropske gospodarske skupnosti in Evropske skupnosti za atomsko energijo za javnost (Council Regulation, 2003) in Uredba Sveta (EU)2015/496 z dne 17. marca 2015 o spremembi Uredbe (EGS, Euratom) št. 354/83 v zvezi z deponiranjem arhivskega gradiva institucij pri Evropskem univerzitetnem inštitutu v Firencah (Council Regulation, 2015).

Z vrednotenjem dokumentov se ukvarja le prva uredba iz davnega leta 1983. Ta določa, da vsaka institucija v zgodovinske arhive prenese vse dokumente in spise, ki jih ima v svojih tekočih arhivih, najpozneje v 15 letih od datuma njihovega nastanka. Institucija opravi izbiranje (odbiranje) gradiva z namenom ločevanja dokumentov in spisov (dokumentov iz zapisov), ki naj se ohranijo, od tistih, ki nimajo upravne ali zgodovinske vrednosti (Council Regulation, 1983, 7. čl.<sup>3</sup>). Vsaka institucija lahko sprejme podrobna notranja pravila za izvajanje te uredbe (Council Regulation, 1983, 9. čl.<sup>4</sup>).

Navedena uredba nam pove, da sta pri določanju arhivskega gradiva pomembni le upravna in zgodovinska vrednost. Prva je v pomoč instituciji, druga pa naj bi bila verjetno namenjena raznoraznim raziskovalcem. Ta opredelitev je zelo siromašna. Vprašamo se, kje je vrednost dokumentov za strokovne in pravne potrebe? Prav tako preseneča tudi

3 Article 7; Each institution shall transfer to the historical archives all documents and records contained in their current archives no later than 15 years after their date of creation. According to the criteria laid down by each institution pursuant to Article 9, there shall be an initial sorting process with the purpose of separating documents and records that are to be preserved from those that have no administrative or historical value.

4 Article 9: Each institution may adopt, at internal level, detailed rules for the application of this Regulation.

določba, da institucija sama določa pravila za ohranitev dokumentov in jih tudi sama odbira. To že na prvi pogled daje proste roke izločanju in uničevanju določenih dokumentov, ki morda niso v prid instituciji oziroma njenim potrebam, pač pa drugim pravnim oziroma fizičnim osebam.

## B.

Uredb in direktiv, ki bi zadevale procese arhiviranja dokumentov držav članic, pravzaprav ni. So le neobvezne resolucije in priporočila.

Prva taka resolucija, ki je stara že trideset let, je Resolucija Sveta in kulturnih ministrov glede arhivov, sprejeta na srečanju Sveta 14. novembra 1991 (Resolution of the Council, 1991). Njen namen je bil spodbuditi raziskavo o možnosti večjega sodelovanja držav članic EU na arhivskem področju.

Glede na predvideno širitev Evropske unije s 15 na 25 držav članic in zaradi hitrih sprememb v arhivski praksi, kot posledici razvoja novih informacijskih tehnologij je 6. maja 2003 sledila Resolucija Sveta o arhivih držav članic (Council Resolution on Archives, 2003), ki je v nekem smislu nadaljevanje Resolucije iz leta 1991. Ta resolucija je pozvala Evropsko komisijo naj skliče strokovnjake, ki bi predstavljali takratnih petnajst držav članic EU in deset držav pristopnic, da bi preučili položaj javnih arhivov v Evropi in Svetu predložili poročilo, ki bi vključevalo usmeritve za večjo sodelovanje na področju arhivov na evropski ravni. Resolucija poudarja pomen arhivov za razumevanje zgodovine in kulture Evrope in izraža prepričanje, da dobro ohranjeni in dostopni arhivi prispevajo k demokratičnemu delovanju družb, zlasti v obdobju velikih sprememb v Evropi in njeni širitvi 1. maja 2004. Ta, čeprav tudi že nekoliko stara resolucija, je seveda danes precej bolj aktualna kot prva, saj EU danes šteje 27 članic in ne več 12 kot ob prvi resoluciji.<sup>5</sup>

„Poročilo o arhivih v razširjeni Evropski uniji“ (National Experts Group, 2005), ki ga je pripravila skupina strokovnjakov iz držav članic in je bila sprejeta februarja 2005, naj bi predstavljal temelj za prihodnji razvoj arhivov v Evropi. Na prošnjo Sveta vključuje predloge za konkretne dejavnosti in smernice za večje sodelovanje na področju arhivov na evropski ravni. V tem poročilu je najprej predstavljena organizacija arhivskega sektorja v Evropi. V drugem delu je pod naslovom Dostop do arhivov nekaj ugotovitev tudi o vrednotenju in odbiranju dokumentov (National Experts Group, 2005, str. 86–89).

Skupina strokovnjakov je zaključila, da obstajajo velike in pomembne razlike v nacionalnih zakonodajah in predpisih, predvsem na področju delovanja državne arhivske službe. V času dejanskega prekrivanja upravnih, socialnih, gospodarskih in drugih procesov znotraj Evropske unije bi bila evropska priporočila za izboljšanje kakovosti vrednotenja in sprejetju strategij za odbiranje arhivskega gradiva na podlagi obsežne znanstvene študije postopka ustvarjanja dokumentov, zelo koristna. Skupina je bila mnjenja, da bi bilo sodelovanje med vsemi državami članicami EU in Evropsko komisijo glede na usklajevanje evropske strategije in nacionalnih strategij, zelo pozitivno.

Glede predpisov s področja vrednotenja in odbiranja dokumentov je strokovna skupina ugotovila, da »arhivski zakoni«<sup>5</sup> držav članic v splošnem niso natančni glede meril za odbiranje, niti glede tega, kdo je za to odgovoren in tudi ne glede postopka vrednotenja

<sup>5</sup> Ob tem le kratko pojasnilo: Svet je osrednja institucija odločanja EU, ki skupaj z Evropskim parlamentom sprejema evropsko zakonodajo in proračun. Svet EU oblikuje in sprejema tudi dokumente, kot so sklepi, resolucije in izjave, ki nimajo pravnih posledic. Evropska komisija je izvršilni organ EU in edini, ki lahko predlaga parlamentu in Svetu nove zakonske akte in proračun, skrbi pa tudi za njihovo izvajanje. Njena naloga je zagovarjati interese Evropske Unije kot celote in ne interesov posameznih držav. Odgovorna je parlamentu, ki jo lahko tudi predčasno razreši. Sestavljajo jo komisarji, ki so odgovorni za posamezna področja delovanja, predsednik in visoki predstavnik Unije za zunanje zadeve in varnostno politiko.

in izbora dokumentov za trajno hrambo. Razen tega se področje delovanja nacionalne oziroma državne arhivske službe razlikuje po državah: v nekaterih državah je nacionalna arhivska služba odgovorna za celoten življenjski cikel upravljanja z dokumentarnim in arhivskim gradivom, v drugih ne.

Prav tako se v nekaterih državah pristojnosti državne arhivske službe raztezajo na celotno državo v drugih pa zadevajo le dokumente in arhive centralnih oblastnih organov. Nadzor nad ocenjevanjem dokumentov ni povsod pod nadzorom državne arhivske službe. Skratka, je ugotovila arhivska strokovna skupina, v pristopih in procesih ocenjevanja dokumentov so velike razlike. Vsaka država razvija svojo strategijo, ne da bi razumela, kaj se na istem področju dela v drugih državah in evropskih institucijah. Usklajevanje na tem področju bi gotovo prispevalo k konstituiranju skupne evropske arhivske dediščine in vneslo harmonijo med nacionalne arhive posameznih držav članic EU in arhive institucij EU.

### **3. VREDNOTENJE DOKUMENTARNEGA GRADIVA V NEKATERIH DRŽAVAH ČLANICAH EU**

#### **A. SLOVENIJA**

Slovenija, ki je v EU vstopila leta 2004, ima zaradi svoje preteklosti zelo bogate izkušnje glede arhivov. Na njenem ozemlju so vsak v določenem obdobju in ozemlju delovali trije totalitarni režimi. Prav tako je država ob uvedbi družbene lastnine in samoupravljanja imela družbeni red, ki je bil v marsičem poseben tudi v pozitivnem smislu. Na eni strani imamo 80% uničenih dokumentov obveščevalne službe in na drugi izredno bogate arhive, ki so odigrali ključno vlogo v času tranzicije, omogočili popravo krivic in rehabilitacijo številnih krivično obsojenih v kazenskih postopkih.

Izkušnje preteklosti so pomembno prispevale k oblikovanju arhivskega prava in s tem tudi postopka ocenjevanja dokumentov ter posledično odbiranja arhivskega gradiva. Slovenija ima dva veljavna arhivska zakona: Zakon o varstvu dokumentarnega in arhivskega gradiva ter arhivih (ZVDAGA) in Zakon o arhivskem gradivu, ki vsebuje osebne podatke o zdravljenju pacienta (ZAGOPP). V odnosu eden do drugega je prvi splošen drugi pa poseben oziroma specialen arhivski zakon.

Prvi zakon ima temeljno določbo evalvacije oziroma vrednotenja dokumentarnega gradiva že v sami definiciji arhivskega gradiva, drugi del pa v členih, ki predpisujejo način določitve dokumentov za trajno hrambo. Arhivsko gradivo zakon opredeli kot tisto dokumentarno gradivo, ki ima trajen pomen za zgodovino, druge znanosti in kulturo ali trajen pomen za pravni interes pravnih in fizičnih oseb. Javno arhivsko gradivo, ki je last države, je arhivsko gradivo državnih organov, samoupravnih lokalnih skupnosti ter pravnih oseb javnega prava in zasebnega prava ter fizičnih oseb, ki so nosilci javnih pooblastil ali izvajalci javnih služb (ZVDAGA, 2014, 2.čl.). Arhivsko gradivo javnopravnih oseb določi pristojni javni arhiv s pisnimi strokovnimi navodili za odbiranje arhivskega gradiva iz dokumentarnega gradiva za vsako javnopravno osebo posebej. Javno arhivsko gradivo javnopravna oseba odbira iz dokumentarnega gradiva in izroča pristojnim javnim arhivom. Do izdaje strokovnih navodil se z vsem dokumentarnim gradivom ravna tako kot z arhivskim gradivom (ZVDAGA, 2014, 34. čl. in 38. čl.). Arhivsko gradivo se določa iz dokumentarnega na podlagi vrednotenja dokumentarnega gradiva. Merila za vrednotenje so naslednja: potrebe zgodovinopisja, drugih znanosti in kulture; potrebe za trajno pravno veljavo za doseganje pravic oseb; pomembnost vsebine gradiva; specifičnost dogodkov in pojavov v določenem času; specifičnost kraja ali območja; pomen javno pravne osebe; pomen avtorja; pomen gradiva z vidika kulturne raznolikosti; izvirnost dokumentov; izvirnost podatkov in informacij; reprezentativni izbor; notranje in

zunanje značilnost gradiva in druga merila, ki jih določi pristojni arhiv. Pisno strokovno navodilo za odbiranje arhivskega gradiva iz dokumentarnega sprejme komisija pristojnega arhiva, ki jo imenuje predstojnik arhiva. Najmanj tričlansko komisijo sestavljajo predstavniki pristojnega arhiva in predstavnik javnopravne osebe, za katero se sprejema pisno navodilo. Ob statusnih in organizacijskih spremembah javnopravnih oseb ter ob spremembi poslovanja ali upravljanja z dokumentarnim gradivom je treba navodilo obravnavati in prilagoditi spremembam (ZVDAGA, 2014, 40. čl.).

Drugi arhivski zakon (ZAGOPP, 2016) je bil sprejet na podlagi odločbe ustavnega sodišča (Ustavna odločba U-I-70/12 z dne 21. 3. 2014), ki je bilo mnenja, da splošna ureditev arhiviranja po ZVDAGA (2014) ne more veljati tudi za tako specifično gradivo, kot je zdravstvena dokumentacija. Ta kratek zakon na treh mestih uveljavlja velik odmik od splošnega arhivskega zakona. Glede na usmeritev prispevka poudarimo le, da zakon arhive delno izključuje iz procesa ocenjevanja dokumentarnega gradiva, kar je zelo neustrezno in zaskrbljujoče saj omogoča, da se določene slabosti in izrabe zdravstva trajno izbrišejo iz kolektivnega spomina. Tak primer je psihiatrična zdravstvena dokumentacija. To je področje, kjer so zlorabe bodisi v osebne bodisi politične namene zelo pogoste.

Ena največjih pridobitev slovenskega arhivskega prava je opredelitev arhivskega gradiva ter postopek določanja arhivskega gradiva. Je plod dolgoletnih izkušenj na arhivskem področju in zelo zavzetega sodelovanja arhivistov pri nastanku zakona. Slovenski arhivisti so tako dolžni skrbeti za arhivsko gradivo od njegovega nastanka. Zato arhivi praviloma pripravijo pisna strokovna navodila, v katerih opredelijo tisto gradivo, ki ima lastnosti arhivskega, še predno je to gradivo nastalo. Če ima organizacija izdelan klasifikacijski načrt razvrščanja dokumentov, se ta opredelitev označi poleg rokov hrambe, ki jih je organizacija sicer določila za posamezne zvrsti gradiva. Če organizacija nima izoblikovanega klasifikacijskega načrta, se arhivsko gradivo opredeli opisno po vsebini. Tako je ustvarjalec seznanjen že vnaprej, da ustvarja arhivsko gradivo in je dolžan z njim temu primerno ravnati. Vendar se je v poslovanju z zapisi oziroma dokumenti izkazalo, da prihaja do napačnega klasificiranja dokumentov, kar se zgodi iz različnih razlogov, bodisi zaradi nezadostne usposobljenosti zaposlenih, bodisi zaradi napačne interpretacije vsebine dokumenta. Lahko se tudi zgodi, da posamezen dokument nekako ne sodi v nobenega izmed klasifikacijskih razredov in se ga posledično uvrsti kamor koli z namenom, da je nekje odložen. Prav tako je doba tridesetih let, kolikor približno znaša življenjska doba dokumenta pri ustvarjalcu, precej dolga. V obdobju tridesetih let se lahko spremeni področna zakonodaja, lahko se pojavijo določene deviacije v družbi, lahko pride do nenadnih, vendar pomembnih ali znamenitih dogodkov, ki jih za trideset let vnaprej ne moremo predvideti. Prav tako se v obdobju tridesetih let pogosto spremenijo pristojnosti in naloge posameznega organa, posledica česar je tudi ustvarjanje novih zvrsti gradiva. Zato je slovenska zakonodaja predvidela določanje arhivskega gradiva kadar koli v življenjskem ciklu dokumenta; torej po sprejemu pisnega strokovnega navodila, za gradivo, ki nastaja, pristojni arhiv lahko izda še dodatno pisno strokovno navodilo, kjer še dodatno opredeli arhivsko gradivo, ki pred tem ni bilo prepoznano kot arhivsko. Prav tako pa državni arhiv lahko določi tisto gradivo, ki se zaradi njegove kulturne ali zgodovinske vrednosti sploh ne sme uničiti (ZVDAGA, 2014, 2. odst. 15. čl.). V primeru, da pristojni arhiv ni izdal pisnega strokovnega navodila, so ustvarjalci dolžni z vsem gradivom ravnati kot se ravna z arhivskim gradivom (ZVDAGA, 2014, 34. čl.). To pomeni, da se noben del gradiva ne sme izločati, uničevati ter kakor koli z njim malomarno ravnati. Arhivsko gradivo je v kazenskem zakoniku zaščiteno na dveh mestih, in sicer kot kulturni spomenik (člen 219) in kot pomembna uradna listina (člen 259). Tudi zasebno gradivo se lahko razglasi za arhivskega, vendar ne za javno arhivsko gradivo, ampak za zasebno arhivsko gradivo, če tako ugotovi pristojni arhiv (ZVDAGA, 2014, 61. čl.). Osebe zasebnega prava, ki imajo v lasti takšno gradivo, so

dolžni skrbeti za to gradivo. (ZVDAGA, 2014, 5. odst. 34. čl.) Vsekakor ga lahko tudi izročijo javnemu arhivu v hrambo z odplačnimi ali neodplačnimi pravnimi posli, torej s primerno pogodbo (ZVDAGA, 2014, 1. odst. 61. čl.).

## ČEŠKA

Tudi Češka, ki se uvršča med samostojne države od leta 1993, je ena izmed tistih držav, ki so se Evropski uniji pridružile, tako kot Slovenija, leta 2004. Zakon, ki ureja arhivsko službo in arhivsko gradivo velja od 1. januarja 2005 (Act on Archiving and Records Management, Act No.499/2004 Coll) in je v primerjavi z zakoni z evropskega severa precej daljši, saj obsega več kot 100 členov. Zakon opredeljuje arhivsko gradivo kot zapise, ki so zaradi časa njihovega nastanka, vsebine, izvora in zunanjih znakov ter trajne vrednosti, ki izhaja iz njihove politične, ekonomske, zakonske, zgodovinske, kulturne znanstvene ali informativne pomembnosti odbrani v javnem interesu za trajno hrambo. Vrednotenje oziroma izbor arhivskega gradiva opravi pristojni arhiv. (Act on Archiving and Records Management, Act No.499/2004 Coll, 3. čl.)

## DANSKA

Danska je članica Evropske skupnosti že od leta 1973. V skladu z arhivskim zakonom (Danish Archives Act) med naloge državnih arhivov sodijo predvsem zagotavljanje hrambe dokumentov zgodovinske vrednosti, ki so bistvenega upravnega in pravnega pomena za državljanke in oblastne organe, priprava arhivskega gradiva za uporabo, opravljanje raziskav in razširjanje znanja (vedenja) o rezultatih raziskav, pomoč oblastnim organom pri arhivskih zadevah in sodelovanje z lokalnimi ter regionalnimi arhivi. Če smo pozorni pri prebiranju nalog državnih arhivov, lahko razberemo definicijo arhivskega gradiva, ki poleg zgodovinske vrednosti poudarja upravni in pravni pomen tega. Posebne določbe, ki se uporabljajo za dejavnosti danskega nacionalnega arhiva, pa so bile določene v izvršilni odredbi ministra za kulturo. V odredbi je Državni arhiv pooblaščen za izdajo nadaljnjih pravil in predpisov glede pridobitve arhivskega gradiva od državnih organov, glede določanja in odobritve arhivskih sistemov, glede vzpostavitve, načrtovanja in delovanja dokumentnih sistemov, glede ukrepov za zagotovitev primerne elektronskega arhiviranja ter glede vrednotenja gradiva državnih organov (Rigsarkivet, s.d.).

## ESTONIJA

Majhna baltska država na severu Evrope, Estonija, je tako kot Slovenija postala članica Evropske unije leta 2004. Njena zgodovina je skozi stoletja zaznamovana z vladavino Nemškega reda, Dancev, Švedov, Poljakov in Rusov, po koncu prve svetovne vojne pa si je priborila kratkotrajno samostojnost, ki jo je izgubila po večkratnih zasedanjih Nemčije in Sovjetske zveze po drugi svetovni vojni, ko je postala sestavni del Sovjetske zveze. Svojo samostojnost je obnovila 20. avgusta 1991 (Encyclopaedia Britannica, Estonia, History). Govorimo o državi z burno zgodovino, z narodom, ki se je skozi stoletja borilo za obstoj, ter o državi, za katero velja, da je ena najbolj digitalno naprednih družb na svetu. Arhivska dejavnost in postopanje z arhivskim gradivom ureja arhivski zakon Archives Act (z veljavnostjo od 1. 1. 2012), ki je v primerjavi s slovenskim arhivskim zakonom neverjetno kratek. Arhivsko gradivo Estonije predstavljajo tisti zapisi, ki jih kot takšno na podlagi vrednotenja določi javni arhiv ter je del nacionalne kulturne dediščine in se hrani trajno. Arhivsko gradivo, ki je nastalo pri izvajanju javnih nalog, se izroči državnemu arhivu (Archives Act, 2012, 2. čl.). Pri vrednotenju se upoštevajo predvsem naslednja merila za ohranitev: za potrebe izvajanja javnih pooblastil, za potrebe potrjevanja pravic in poslovanja oseb ter kulturna in zgodovinska vrednost informacije (Archives Act, 2012, 7. čl.).

## FINSKA

Republika Finska, ki je ena izmed petih nordijskih držav, je bila med 13. in 19. stoletjem švedska posest, v začetku 19. stoletja pa je postala avtonomna velika vojvodina v okviru Rusije. Ob izbruhu oktobrske revolucije leta 1917 je Finska razglasila neodvisnost. Evropski uniji se je pridružila leta 1995. Ustvarjalec zapisov določa roke hrambe svojih dokumentov, arhivska služba pa določa, kateri zapisi in informacije se morajo trajno hraniti. V občinah je za organizacijo upravljanja z zapisi in arhivalijami odgovoren občinski svet. Državna arhivska služba izdaja raznovrstne uredbe in druge predpise. Zapisi, ki so določeni za trajno hrambo, se prenesejo v Nacionalni ali provincialne arhive. Se pa arhivska služba in položaj državnega arhiva v odnosu do drugih državnih organov v okviru zakonodaje glede hrambe gradiva sooča z mnogimi praktičnimi vprašanji, ki bi jih s posodobitvijo arhivske zakonodaje bilo potrebno urediti (Henttonen, 2018). Ne glede na zakonske določbe se v praksi pojavlja to, da je arhivska služba preslišana in ustvarjalci vedno ne spoštujejo odločitev arhivske službe, kaj naj se ohrani za vedno (Henttonen, 2018).

## FRANCIJA

Francija, ki je v evropskem in svetovnem oziru skozi zgodovino imela izreden pomen, je tudi med ustanoviteljicami Evropske unije. Kako pomenljivo vlogo ima, vsekakor priča dejstvo, da je ena izmed ustanoviteljic Združenih narodov, stalna članica Varnostnega sveta in tudi članica zveze NATO. Sestavni del Francije predstavljajo tudi Francoska Gvajana, Guadeloupe, Martinique, Mayotte in Reunion. Varstvo arhivskega gradiva ureja Zakon o nacionalni dediščini (Code du patrimoine, zadnjič spremenjen 1. 1. 2022). Za arhivsko gradivo označuje vse dokumente, ki so pomembni za potrebe uprave in uveljavljanje pravic fizičnih ali pravnih oseb, javnih ali zasebnih, ter za zgodovinske raziskave, ne glede na datum in kraj nastanka, obliko, nosilec zapisa, ki so nastali oziroma so bili prejeti pri fizičnih ali pravnih osebah ter pri vseh službah, javnih ali zasebnih organizacijah pri izvajanju njihove dejavnosti. Javno arhivsko gradivo predstavljajo dokumenti, ki nastajajo pri dejavnosti države, lokalnih oblasti, javnih ustanov in drugih pravnih oseb javnega prava, iz vodenja javne službe ali opravljanja nalog javne osebe zasebnega prava ter zapisniki in imeniki javnih ali ministrskih uradov ter registri notarsko overjenih pogodb. Arhivsko gradivo se določi na podlagi seznama arhivskega gradiva, ki ga oblikujeta ustvarjalec arhivskega gradiva in arhiv (Code du patrimoine, 2022. L 211-1 – 212-2).

## ITALIJA

Italija, ena izmed ustanovnih članic Evropske skupnosti, je država, kjer domuje tudi Zgodovinski arhiv Evropske unije. Italijanski državni arhivi prevzemajo samo tisto gradivo, iz katerega so predhodno izločeni dokumenti, ki v arhiv ne sodijo. O tem, katero gradivo se predaja arhivu odloča posebna komisija (Commissioni di sorveglianza), ki deluje pri vsakem državnem organu ali uradu. Komisijo sestavljajo dva predstavnika dotičnega organa, en predstavnik pristojnega državnega arhiva in en predstavnik ministrstva za notranje zadeve. Naloga komisije je, da določi gradivo, ki ga je potrebno hraniti trajno, prav tako pa opravlja nadzor nad odbiranjem. Ustanovitev komisije je določena z Zakonom o kulturnih in okoljskih dobrinah (Codice dei Beni Culturali e del Paesaggio, 2004), naloge in sestava pa je podrobneje določena z dekreti predsednika republike (Decreti del Presidente della Repubblica).

## NIZOZEMSKA

Nizozemska, država z uradnim imenom Kraljevina Nizozemska, je ena izmed ustanovnih članic EU, saj je že 18. aprila 1951 vstopila v Evropsko skupnost za premog in jeklo, ki predstavlja predhodnico EU). Gre za nekdanjo kolonialna silo, ki ima ozemlje tako v

Evropi kot tudi na Karibskih otokih. Sestavljajo jo štiri med seboj enakopravne države: Nizozemska, ki se nahaja v severozahodni Evropi, Aruba in Curaçao (otoka v Zveznih Antilih) ter Sint Maarten (južni del otoka v Malih Antilih). Sedaj veljavni arhivski zakon (Public Records Act, 1995) iz leta 1995 ureja hrambo in ravnanje z dokumentarnim in arhivskim gradivom nizozemskih oblastnih organov, vseh javnopravnih oseb in vseh ustanov z javnimi pooblastili. Podrobnejše določbe vsebuje arhivska uredba (Archiefbesluit, 1995), nekatera področja pa so še natančneje opredeljena s pravilniki ministrstev. Upravljanje z dokumentarnim in arhivskim gradivom je povezano tudi z več drugimi pravnimi predpisi. Nizozemski oblastni organi morajo upoštevati zahteve, ki jih poleg arhivskega zakona določata tudi zakon o »odprti vladi« (Wet openbaarhied van bestuur) in zakon o varstvu osebnih podatkov (Wet bescherming persoons gegevens), saj vsi trije zakoni vsebujejo določbe, kako naj oblastni organi ravnajo z gradivom, ki pri njih nastaja oziroma, ki ga prejemajo. Glede valorizacije in odbiranja arhivski zakon določa, da vsak oblastni organ mora oblikovati načrt hrambe (Retention schedule), iz katerega je jasno razvidno, kateri dokumenti so namenjeni trajni hrambi in katere je mogoče po določenem času uničiti. Arhivski predpisi določajo, da je pri valorizaciji potrebno upoštevati naloge oblastnega organa, odnos med posameznimi oblastnimi organi, vrednost dokumentov za nacionalno kulturno dediščino, pomen dokumentov za oblastne organe, posamezne državljane in raziskovalce zgodovine. Trajno je treba ohraniti gradivo, ki je pomembno za oblastne organe same, za pravno varnost državljanov in gradivo, ki ima posebno družbeno vrednost ne le za sedanje, ampak tudi za bodoče raziskave kulturne dediščine. Za oblikovanje načrta hrambe je odgovoren ustvarjalec sam, pri postopku valorizacije pa sodelujejo tudi minister za šolstvo, kulturo in znanost, ki je odgovoren za vladno arhivsko politiko, direktor Državne arhivske službe (State Archives service), ki ministru svetuje o vseh arhivskih zadevah, Svet za kulturo, ki je stalno posvetovalno telo ministra in mu svetuje glede vsakega osnutka načrta hrambe (retention schedule), vladna agencija za koordinacijo, ki tudi pogosto sodeluje pri oblikovanju teh načrtov, zunanji eksperti (na primer strokovnjaki za socialno zgodovino /social history/. Vpliv na oblikovanje načrtov hrambe (retention schedule) imajo tudi vsi državljani. Pred potrditvijo načrta hrambe imajo vsi državljani možnost, da lahko postavljajo vprašanja in dajejo predloge za spremembe oziroma izboljšave, ki jih potem obravnavajo direktor državne arhivske službe in pristojni skrbniki gradiva v sodelovanju s Svetom za kulturno dediščino.

## SLOVAŠKA

Slovaška je država, ki je več stoletij pripadala madžarski nadvladi, in se tik pred drugo svetovno združila s Češko, med samo vojno je uživala nekaj samostojnosti, po vojni pa je skupaj s Češko spet tvorila eno državo. Vendar slednja od 1. januarja 1993 ni več obstajala, saj sta tako Slovaška kot Češka svojo pot nadaljevali kot samostojni državi. Slovaška se je tako kot Slovenija Evropski uniji pridružila leta 2004. Veljavni arhivski zakon iz leta 2002 je razmeroma kratek s samo 35 členi, določa pa, da je arhivski dokument (»archive document«) zapis, ki ima trajno dokumentarno vrednost, pomembno za poznavanje zgodovine Slovaške in slovaškega naroda. Za vrednotenje gradiva oziroma za odločanje o tem, ali imajo dokumenti določen rok trajanja ali pa jih je treba hraniti trajno, preko arhiva odloča ministrstvo za notranje zadeve, ki je sicer pristojno za arhive. Vrednotenje se izvaja v procesu »škartiranja« (»discard procedure«).

## ŠVEDSKA

Kraljevina Švedska se lahko ponaša s tem, da svojo neodvisnost ohranja še od zgodnjega 16. stoletja dalje. Kljub temu, da je monarhija, je že od 18. stoletja dalje parlamentarna država, ki je že v 18. stoletju uredila pravico do dostopa do informacij. Tudi do



arhivskega gradiva. Zakon, ki ureja arhivska vprašanja, je bil sprejet 7. Junija leta 1990 z naslovom Arhivski zakon in določa, da je arhivsko gradivo odbrano iz uradne dokumentacije, ki se nanaša na delovanje javnopravne osebe in iz dokumentacije, ki je določena v drugem poglavju Zakona o svobodi tiska (The Freedom of the Press Act), da oblasti določijo gradivo, ki se nanaša na komunikacijo organa in ostalo delovno gradivo, ki bo ohranjeno in kot tako je opredeljeno kot arhivsko gradivo. Arhivsko gradivo javne uprave je del nacionalne kulturne dediščine. V določilih zakona o pravici dostopa, lahko razberemo namen arhiviranja in sicer, da bo zagotovljena pravica do prostega dostopa javnih listin, da bo zagotovljen dostop v pravne in upravne namene ter za namen raziskovanja. Dolžnost ustvarjalca je, da opravi valorizacijo gradiva in določi gradivo za izločanje. Arhiv je pristojen za nadzor omenjenih obveznosti ustvarjalca. (Freedom of the Press Act (1949:105), Public Access to Information and Secrecy Act (2009:400), Arkivlag (1990:782), Arkivförordning (1991:446))

## ZAKLJUČEK

Pri pregledu zakonskih ureditev posameznih držav glede arhiviranja oziroma vrednotenja dokumentarnega gradiva, lahko ugotovimo, da so nekatere določbe skladnejše s ugotovitvami arhivske znanosti pri državah članicah EU in druge, ki so pomanjkljive tako v zakonodajah držav članic EU kot pri institucijah EU. V več državah je vrednotenje dokumentarnega gradiva naloga arhivske javne službe. V tistih državah, kjer vrednotenje ni ekskluzivno naloga arhivske službe, pa je le ta zadolžena za izvajanje nadzora nad vrednotenjem dokumentarnega gradiva v skladu s sprejetimi predpisi. V institucijah Evropske unije to ni urejeno na takšen ali vsaj podoben način, kar pa bi bilo s stališča arhivske znanosti seveda nujno. Ustvarjalec arhivskega gradiva namreč ne bi smel samovoljno določati tistih zapisov oziroma dokumentov, ki jih je treba trajno ohraniti. Take odločitve so lahko povsem subjektivne. Le sodelovanje ustvarjalca zapisov in arhivskih strokovnjakov bi lahko zagotovilo ohranitev dokumentov, ki so nujni za zagotovitev pravne varnosti oseb na eni, ter ohranjanja kulturne dediščine na drugi strani.

Ob današnjem stanju na arhivskem področju v Evropski uniji je v smislu njenih temeljnih vrednot, kot so človekovo dostojanstvo, svoboda, demokracija, enakost, pravna država in človekove pravice, več kot le zaželeno oživiti prizadevanja, ki so botrovala Resoluciji Sveta in kulturnih ministrov glede arhivov iz leta 1991 in Resoluciji Sveta o arhivih držav članic iz leta 2003. Ob vpogledu v zakone, ki urejajo področje arhiviranja držav članic Evropske unije in institucij Evropske unije, je nadaljevanje harmonizacije arhivskih predpisov ne le zaželeno temveč nujno. Tu je valorizacija dokumentarnega gradiva prav gotovo v ospredju. Na tem segmentu je najvažnejše določiti akterje določanja arhivskega gradiva in kriterije, ki vplivajo na selekcijo dokumentov. Tudi tokrat bi bilo potrebno vzpostaviti skupino strokovnjakov iz vseh držav članic, ki bi poglobljeno obdelala najvažnejša področja varovanja arhivskega gradiva. Med te prav gotovo sodi ovrednotenje dokumentarnega gradiva, a seveda tudi druga področja, kot so terminologija, skrb za celotni življenjski cikel dokumentov, dostop do dokumentov, izobrazbo arhivistov in dokumentologov (upravljalcev dokumentov oz. records managerjev) itd. Posebno pozornost bo ob tem treba posvetiti izboru teh strokovnjakov, ki bi moral temeljiti izključno na izkazanih dosežkih na znanstvenem področju.

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## THE ROLE OF PARTICIPATORY PRACTICES IN HERITAGE INSTITUTIONS

### Abstract

**Purpose:** *Modernity is marked by the need for heritage institutions to open up to their audiences and include them in their programs with the aim of democratic action. Therefore, participatory methods of work were designed over the past few decades to complement the work of each heritage institution. As one of the participatory methods, crowdsourcing was researched and explained its conceptual framework, presented an example of the design of such a project on a case study that confirms the hypothesis that participatory methods of work contribute to archives, libraries and museums.*

**Method/approach:** *We used the method of reviewing scientific and professional literature and studies of various examples of participatory projects. In the case of one project, we presented the usefulness of participatory practices in archives, libraries and museums and presented which are the most important elements in the design of such a project.*

**Results:** *We found that participatory projects serve in archives, libraries and museums as a tool for digitization and processing large amounts of data as they contribute to the more open functioning of these institutions. We discovered what needs to be taken into account when designing a participatory project and that for each heritage institution and individual project needs to be adjusted according to the type of institution, the purpose of the project, the audience we address and the result we want to achieve.*

**Conclusions/findings:** *In heritage institutions of the Anglo-Saxon countries, participatory methods are an established practice of stimulate public interest, but there are very few cases in Slovenia. We find that institutions that implement participatory projects are more successful in building new virtual communities and actively involving them in the institutions workflow, thereby building the trust and loyalty of users.*

**Key words:** *heritage, archive, museum, library, participation, crowdsourcing*

## IL RUOLO DELLE PRATICHE PARTECIPATIVE NELLE ISTITUZIONI DEL PATRIMONIO

### Sintesi

**Scopo:** *la modernità è caratterizzata dalla necessità che le istituzioni del patrimonio si aprano al loro pubblico e lo includano nei loro programmi con l'obiettivo di un'azione democratica. Pertanto, negli ultimi decenni sono stati progettati metodi di lavoro partecipativo per integrare il lavoro di ciascuna istituzione del patrimonio. Come uno dei metodi partecipativi, il crowdsourcing è stato ricercato e spiegato il suo quadro concettuale, presentato un esempio della progettazione di un tale progetto su un caso di studio che conferma l'ipotesi che i metodi di lavoro partecipativo contribuiscano ad archivi, biblioteche e musei.*

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**Metodo/approccio:** Abbiamo utilizzato il metodo di revisione della letteratura scientifica e professionale e degli studi di vari esempi di progetti partecipativi. Nel caso di un progetto, abbiamo presentato l'utilità delle pratiche partecipative in archivi, biblioteche e musei e presentato quali sono gli elementi più importanti nella progettazione di un tale progetto.

**Risultati:** abbiamo scoperto che i progetti partecipativi servono in archivi, biblioteche e musei come strumento per la digitalizzazione e l'elaborazione di grandi quantità di dati in quanto contribuiscono a un funzionamento più aperto di queste istituzioni. Abbiamo scoperto cosa bisogna tenere in considerazione quando si progetta un progetto partecipativo e che per ogni istituzione del patrimonio e progetto individuale deve essere adattato in base al tipo di istituzione, allo scopo del progetto, al pubblico a cui ci rivolgiamo e al risultato che vogliamo ottenere raggiungere.

**Conclusioni/risultati:** nelle istituzioni del patrimonio dei paesi anglosassoni, i metodi partecipativi sono una pratica consolidata per stimolare l'interesse pubblico, ma ci sono pochissimi casi in Slovenia. Troviamo che le istituzioni che implementano progetti partecipativi hanno più successo nella costruzione di nuove comunità virtuali e nel coinvolgerle attivamente nel flusso di lavoro delle istituzioni, costruendo così la fiducia e la fedeltà degli utenti.

**Parole chiave:** patrimonio, archivio, museo, biblioteca, partecipazione, crowdsourcing

## VLOGA PARTICIPATIVNIH PRAKS V DEDIŠČINSKIH USTANOVAH

### Izvleček

**Namen:** Sodobnost je zaznamovana s potrebo, da se dediščinske ustanove odpirajo k svoji publiki in jo s ciljem demokratičnega delovanja vključujejo v svoje programe. Zato so bile v preteklih nekaj desetletjih zasnovane participativne metode, kot dopolnitev dela posamezne dediščinske panoge. Kot eno od participativnih metod smo podrobneje raziskali *crowdsourcing* (slo. *delo množic*) in razložili njegove konceptualne okvirje, predstavili primer zasnove tovrstnega projekta na primeru iz prakse, ki potrjuje hipotezo, da participativne metode dela, doprinesejo arhivom, knjižnicam in muzejem.

**Metoda/pristop:** Uporabili smo metodo pregleda znanstvene in strokovne literature in študije različnih primerov participativnih projektov. Na primeru enega projekta smo prikazali uporabnost participativnih praks v arhivskih, muzejskih in knjižničnih ustanovah in predstavili kateri so najpomembnejši elementi pri zasnovi takega projekta.

**Rezultati:** Ugotovili smo, da participativni projekti služijo v arhivih, muzejih in knjižnicah kot orodje za digitalizacijo in obdelavo velikih količin podatkov saj doprinesejo k bolj odprtemu delovanju teh ustanov. Dognali smo kaj je potrebno upoštevati pri zasnovi participativnega projekta in, da je za vsako dediščinsko ustanovo in posamezen projekt potrebna prilagoditev, glede na vrsto ustanove, namen projekta, publiko, ki jo nagovarjamo in rezultat, ki ga želimo doseči.

**Sklepi/ugotovitve:** V dediščinskih ustanovah anglosaških držav so participativne metode uveljavljena praksa vzpodbujanja zanimanja publike, zelo malo pa je primerov v Sloveniji. Ugotavljamo, da so ustanove, ki izvajajo participativne projekte uspešnejše pri gradnji novih virtualnih skupnosti in jih aktivno vključujejo v delovanje ustanove, s tem pa gradijo zaupanje in vdanost uporabnikov.

**Ključne besede:** dediščina, arhiv, muzej, knjižnica, participacija, *crowdsourcing*

## UVOD

Dediščinske ustanove, arhivi, knjižnice in muzeji (odslej AKM), so javni zavodi ustanovljeni za opravljanje nalog zbiranja, varstva in komuniciranja kulturnih dobrin. Načini, kako se to gradivo zbira in varuje, so predpisani z zakonodajo in se izvajajo v skladu s standardi posamezne dejavnosti.<sup>2</sup> Do druge polovice 20. stoletja je zbiranje in dokumentiranje gradiva potekalo analogno, ob koncu 20. stoletja pa se je z razvojem sodobne informativno komunikacijske tehnologije (odslej IKT) preselilo v digitalno okolje. Dediščinske ustanove zato za opravljanje osnovnih funkcij zbiranja, varovanja, komunikacije in omogočanja dostopnosti do gradiv uporabljajo digitalno tehnologijo in izrabljajo nove možnosti, ki jih ponujajo IKT. Z digitalizacijo so AKM nakopičeno znanje in informacije iz svojih zbirk začele objavljati na spletu ter poleg informiranja svojih uporabnikov omogočati tudi kreativno, raziskovalno ali zgolj razvedrilno uporabo.

Pred dobrim desetletjem so se v severno ameriških državah, v Avstraliji in nekaterih evropskih državah pojavile prakse, združene pod pojmom *znanost za državljane*<sup>3</sup> (angl. *citizen science*). V različne projekte so začele vključevati veliko število amaterskih prostovoljcev, ki so sodelovali pri zbiranju in obdelavi podatkov, terenskem delu in oblikovanju novih interpretacij. Mia Ridge prepoznava projekte znanosti za državljane kot tiste, ki nagovarjajo publiko k sodelovanju z znanstveniki in so pomembna podstat za razvoj participativnih *crowdsourcing* projektov (2014), o katerih bo govora v nadaljevanju.

### 1.1 RAZISKOVALNA VPRAŠANJA

Sodobne dediščinske ustanove omogočajo uporabnikom dostop do gradiva, ki ga hranijo, možnost, da se odzovejo na to, kar so videli in zagotovilo, da je na drugi strani nekdo, ki jih sliši. Šele ko si ustanova prizadeva delovati demokratično in aktivno vključuje publiko v svoje delovanje, postane središče kulturnega in socialnega življenja neke skupnosti (Simon, 2010). Participacija pomeni, da se ustanova odpre publiko s povabilom za sodelovanje in ji zaupa, ko prispeva svoje delo in znanje. Povod za raziskavo so bila torej vprašanja: kdo so sodelujoči, kakšna je njihova motivacija da prispevajo k participativnem projektu, kakšno korist imata oba deležnika od sodelovanja (ustanova in sodelujoči) in ali se izvajanje takega projekta sploh izplača?

## PARTICIPATIVNOST V DEDIŠČINSKIH USTANOVAH

Participativni projekti se v praksah varovanja kulturne dediščine pojavljajo že vsaj sto let, četudi se je ustrezna terminologija razvila nedavno (Simon, 2010). Zanimiv zgodovinski primer je priprava Oxfordskega slovarja angleškega jezika, ko je leta 1879<sup>4</sup> James Murray vodil projekt zbiranja angleških besed od neznanih prostovoljcev (Ivanjko in Zloti, 2019).

Razumevanje, kaj je vključevanje publike v izvajanje javne službe, se je sčasoma spreminjalo: od didaktičnih praks, kjer ima obiskovalec pasivno vlogo, do demokratičnih metod participacije, podprte s tehnološkim razvojem in digitalnimi komunikacijskimi platformami, ki obiskovalca angažirajo k aktivni udeležbi. Danes so participativne

2 Slovenske muzejske ustanove so korak za arhivi in knjižnicami, saj še nimajo samostojnega zakona, ki bi urejal delovanje muzejev, umanjka tudi dodiplomsko izobraževanje, podiplomsko pa je urejeno v sklopu Interdisciplinarnega doktorskega Humanistika in družboslovje, smer Heritologija na Filozofski fakulteti v Ljubljani.

3 Prevod termina *citizen science* se lahko iz angleškega v slovenski jezik prevaja kot *ljubitelska znanost* ali *znanost za državljane* (ZRC SAZU, 2017).

4 Poziv za zbiranje besed *An Appeal to the English-speaking and English-reading Public* dostopen preko <https://public.oed.com/history/archives/april-1879-appeal/>

strategije prepoznane kot znak kvalitete dediščinskih dejavnosti (Palmyre et al., 2020), ki pa ne nadomeščajo tradicionalnih praks, ampak jih izboljšujejo (Simon, 2010). Sodobni muzeji vpeljujejo participativnost pri beleženju dediščine za namen ohranjanja kolektivnega spomina in povezovanja skupnosti, za odpiranje dialoga znotraj skupnosti in vzpodbujanje izražanja različnih stališč. Knjižnice pogosto izboljšujejo kvaliteto podatkov s komentarji in ocenjevanjem, arhivi pa se participativnosti poslužujejo pri transkribiranju rokopisov (Eveleigh, 2014).

Uvajanje participativnih praks temelji na teoretičnih in praktičnih spoznanjih ter participativni etiki. Slednjo določujeta dokumenta<sup>5</sup>, ki ju je pripravila Mednarodna zveza za javno participacijo<sup>6</sup>. Pripravili so sedem temeljnih zahtev, ki določajo da sodelovanje javnosti: 1.) temelji na prepričanju, da imajo tisti, na katere odločitev vpliva, pravico sodelovati v procesu odločanja; 2.) vključuje zavezo, da bo prispevek javnosti vplival na odločitev; 3.) vzpodbuja trajnostne odločitve s prepoznavanjem in sporočanjem potreb in interesov vseh udeležencev, vključno z odločevalci; 4.) išče in omogoča vključevanje vseh tistih, ki bi jih odločitev lahko prizadela ali jih ta odločitev zanima; 5.) išče možnosti za participacijo udeležencev že pri oblikovanju načrta kako bodo sodelovali; 6.) udeležencem zagotavlja informacije, ki jih potrebujejo, da bo njihovo sodelovanje osmišljeno in 7.) sporoča udeležencem, kako je njihov prispevek vplival na sprejeto odločitev.

Nina Simon je definirala ustanovo, ki v svojem okolju deluje participativno kot prostor, kjer lahko obiskovalci *soustvarjajo* (angl. *create*) in *delijo* (angl. *share*) vsebine, se *povezujejo* (angl. *connect*) eden z drugim, razpravljajo *o vsebinah* (angl. *around content*) in niso samo pasivni gledalci (2010). Še pomembneje pa je, da jih k temu motivira občutenje samouresničitve ter avtonomije in želja, da aktivno upravljajo z lastnim življenjem, osebnimi vrednotami in bližnjim okoljem (Karadžole, 2020). Participativna kultura je torej večplasten, kontinuiran družbeni proces, s katerim se potrjujejo, zavračajo ali ustvarjajo nove identitete in vrednote posamezne skupine.

Simonova navaja klasifikacijo različnih primerov participacije v kulturnih ustanovah:

- *prispevni projekti* (angl. *contributory projects*), s katerimi se obiskovalce nagovarja, da k institucionalno nadzorovanemu procesu doprinesejo z določenimi predmeti, dejanji ali idejami;
- *skupni projekti* (angl. *collaborative projects*), h katerim so obiskovalci povabljeni kot aktivni sodelavci v ustvarjanju institucionalnega projekta, ki ga je zasnovala in ga ves čas nadzoruje ustanova;
- *soustvarjalni projekti* (angl. *co-creative projects*), pri katerih člani skupnosti delujejo skupaj z zaposlenimi v instituciji od začetka, ko se definira cilje projekta in kasneje, ko se ustvarja program ali razstava, ki je podrejena interesom skupnosti;
- *gostiteljski projekti* (angl. *hosted projects*), pri katerih institucija preda del svojih zmogljivosti in/ali sredstev za predstavitev programov, ki jih razvijajo ali izvajajo javne skupine ali naključni obiskovalci (Simon, 2010).

Participativne prakse pa vendar niso namenjene samo opolnomočenju obiskovalcev, saj ima vsak participativni projekt tri interesne skupine: ustanovo, sodelujoče in publiko (ibid). Za dediščinske ustanove, ki se lotevajo participativnih projektov je pomembno, da vnaprej definirajo cilje, ki jih želijo doseči s tovrstnim delovanjem. V praksi uporabiti katero od participativnih metod, samo zato, ker je to všečno in sodobno, je napačno razumevanje participativnosti in lahko trivializira samo idejo in pomen vključujočih

5 Ključne vrednote za javno participacijo, dostopno prek <https://www.iap2.org/page/corevalues> in Kodex etike za praktike javne participacije, dostopno prek <https://www.iap2.org/page/ethics>

6 International Association for Public Participation, dostopno prek <https://www.iap2.org/mpage/Home>

projektov v kulturnih ustanovah. Teoretičarka Simonova pa ob tem poudarja, da je za implementacijo participativnih praks potrebna korenita sprememba institucionalnega pogleda na to kaj je avtoriteta in kakšna je vloga publike v ustanovi (2010).

## DELO MNOŽIC (ANGL. CROWDSOURCING) – NASTANEK, PROBLEM TERMINA IN APLIKACIJA V DEDIŠČINSKIH USTANOVAH

Izgradnja novih participativnih okolij je v AKM osvetlila potrebo po ponovni konceptualizaciji komunikacije med znanstvenimi raziskavami, znanjem strokovnjakov ter prostovoljskimi praksami kot je *crowdsourcing*, ki se je začel razvijati kot model reševanja nekaterih poslovnih problemov s pomočjo prostovoljne delovne sile. Termin *crowdsourcing* bi lahko v slovenščino prevedli kot *množično zunanje izvajanje* (ZRC SAZU, 2013) ali *delo množic*<sup>7</sup> (Ivanjko in Zlodi, 2019). Leta 2006 je termin skoval Jeff Howe. Združil je besedi *množica* (angl. *crowd*) in *zunanje izvajanje* (angl. *outsourcing*) v razmišljanju, da lahko dediščinske ter raziskovalne ustanove pridobivajo znanje s pomočjo uporabnikov zgolj z motivacijo le-teh in brez denarne izmenjave (Bonacchi et al., 2019).<sup>8</sup> Podrobno ga je opisala Mia Ridge kot termin, ki izvajanje dela, nekoč opravljenega znotraj institucije, prenese na širšo publiko in jo vabi k sodelovanju z *odprtim pozivom* (angl. *open call*). Ta metoda dela postaja vse bolj pogosta v delovanju AKM kot pomoč pri digitalizaciji in obdelavi večjih količin podatkov (Ridge, 2014).

Takoj po Howovi definiciji so začele nastajati znanstvene raziskave,<sup>9</sup> ki so fenomen dela množic pojasnjevale na različne načine (Brabham, 2013).<sup>10</sup> Kljub mnogim definicijam pa je ostal *crowdsourcing* sinonim za produkcijski model, ki zbira kolektivno inteligenco spletnih skupnosti (angl. *online communities* ali *crowds*) in delo razprši med množico ljudi (angl. *the crowd*). V tem kontekstu je to učinkovita metoda, saj lahko geografsko razpršeni prostovoljci delajo skupaj, pripomorejo do novih uvidov v interne probleme in najdejo rešitve (ibid).

Delo množic je v dediščinskih ustanovah zaživelo z digitalizacijo zbirk in razvojem participativno usmerjene različice spletnega omrežja Web 2.0. Ta omogoča širjenje vsebin, ki jih ustvarjajo uporabniki in enostaven dostop do njih. Z razvojem raznovrstnih orodij, kot so aplikacije in družabne platforme, pa Web 2.0 vzpodbuja uporabnike, da komunicirajo in sodelujejo v novem družbenem dialogu.

Ko si kot snovalci projekta dela množic odgovorimo na vprašanja: kaj *želimo* s tem doseči, kakšen nivo kvalitete *želimo*, katero bo primerno občinstvo za izvajanje projekta, pa moramo premisliti, kako bomo delo množic učinkovito moderirali, da bodo pridobljeni podatki resničen doprinos k širjenju znanja, ki ga ustanova zbira. In, kako bomo dokumentirali pridobljene podatke ter gradivo, da bodo v prihodnje uporabni raziskovalcem in ostalim uporabnikom.

Dolgeletne izkušnje so pokazale učinke, ki jih imajo participativni *crowdsourcing* projek-

7 V nadaljevanju bomo uporabljali prevod iz hrvaškega jezika, ki sta ga v svojem članku uvedla Tomislav Ivanjko in Goran Zlodi in ga pojasnjujeta kot bolj primerne v kontekstu muzejskega dela. Portal *Bolje je hrvatski!* predlaga prevod množična podpora (hr. *masovna podrška*), vendar avtorja predlagata, da je boljše nadomestiti besedo podpora z besedo delo, saj označuje proces.

8 Dinesh K. Gupta in Veerbal Sharma ugotavljata, da je bolj primerna razčlenitev besede *crowdsourcing* kombinacija treh terminov: *množica* (angl. *crowd*), *sredstvo* (angl. *resource*) in *uporaba* (angl. *using*) (Gupta in Sharma, 2018, str. 11).

9 Enrique Estellés Arolas in Fernando González Landrón de Guevara sta v pregledu znanstvene literature našla skoraj 40 različnih definicij dela množic. Po analizi 28 različnih definicij sta oblikovala široko definicijo *dela množic* (Ivanjko in Zlodi, 2019, str. 182).

10 Poleg že omenjenega Jeffa Howa tudi David Geiger, Mireia Alcalá Ponce de León, Enrique Estellés Arolas in Fernando González Landrón de Guevara, Trewor Owens, Mia Ridge, Darren Brabham in mnogi drugi.



ti na udeležence, publiko in ustanovo, saj:

- lažje in hitreje doseže cilje za katere znotraj organizacije ne bi imeli časa, finančnih sredstev ali kadra,
- gradi nove (virtualne) skupnosti in jih aktivno vključuje v delovanje ustanove,
- izboljšuje kvaliteto podatkov/virov (npr. z vnosom metapodatkov ali korekcijo katalogov, ki omogočajo bolj učinkovito iskanje),
- doda vrednost podatkom (npr. s komentarji, označevanjem, ocenjevanjem in pregledovanjem),
- omogoča dostopnost podatkov širši množici uporabnikov,
- sprašuje uporabnike in nato analizira odgovore, pridobiva odzive uporabnikov o njihovih željah in potrebah,
- prikazuje vrednost in pomembnost ustanove znotraj skupnosti s tem, da ji omogoča participacijo,
- gradi in krepi zaupanje in vdanost uporabnikov in
- vzbuja občutenje javnega lastništva in odgovornosti pri publiku (Holley, 2010).

Zgoraj naštete ugotovitve izhajajo iz samostojne raziskave Rose Holley, ki je raziskovala koristi dela množic za kulturne ustanove<sup>11</sup>, profil prostovoljcev in ugotavljala, kako so ti motivirani in kaj pridobijo s sodelovanjem.

Prostovoljci so večinoma aktivni in dinamični mlajši ljudje, s polno zaposlitvijo, upokojenci, bolni in invalidi. Holleyeva je definirala aktivnega prostovoljca kot tisto osebo, ki redno sodeluje vsaj enkrat mesečno. Čeprav ima ustanova lahko veliko prostovoljcev, večino dela opravi 10% *super* prostovoljcev, ki pri projektu vztrajajo tudi več let. Vsaj polovica vseh prostovoljcev se odloči za sodelovanje, ker jih zanima vsebina projekta, druga polovica pa zato, ker želijo opravljati družbeno koristno delo. Prostovoljce motivira tudi možnost pridobivanja novih znanj, tako vsebinskih plati projekta, kot tudi praktičnih veščin uporabe računalniške tehnologije. Vztrajajo zato, ker jih delo na projektu bogati in želijo pomagati pri skupnem cilju. Raziskava je tudi pokazala, da se je več ljudi odločilo sodelovati pri projektih neprofitnih organizacij, ker niso želeli, da bi bilo njihovo delo izkoriščeno v komercialne namene (Holley, 2010).

### 3.1 NICH SOURCING

Nekateri raziskovalci pa imajo pomisleke, če je delo množic sploh primerno za kulturno dediščinske projekte (Zlodi in Ivanjko, 2013). Najboljši tovrstni projekti namreč redkokdaj vključujejo večje, anonimne množice ljudi (angl. *massive crowds*), saj k participaciji privabljajo zavzete člane skupnosti (Owens, 2013). Kot še trdi Owens »temeljijo uspešni projekti na dolgotrajni tradiciji prostovoljstva in vpetosti članov skupnosti v ustvarjanje in razvoj javnega dobrega« (Owens, 2013, str. 121). Zlodi in Ivanjko zato predlagata termin *nichsourcing*<sup>12</sup> (2013), ki je logičen razvoj metod dela množic (de Boer et al., 2012). Tu imajo prednost manjše skupine ljubiteljskih raziskovalcev, ki so jim zaupane kompleksnejše naloge in se od njih pričakuje kvalitetne rezultate (ibid). To pa je mogoče, ker manjše (ciljne) skupine povezujejo podobne vrednote in imajo jasne cilje (ibid). Take skupine ljudi so zaradi specializiranih zanimanj tudi bolj motivirane in jih je

11 Avtorica se je v članku ukvarjala s knjižnicami, vendar lahko njene ugotovitve apliciramo tudi na druge vrste dediščinskih ustanov.

12 Termin *nichsourcing* je skovala skupina raziskovalcev (de Boer et al., 2012) in objavila v članku *Nichsourcing: Harnessing the Power of Crowds of Experts*. Termin je v nalogi navajan v izvorni angleški obliki, ker zanj ni bilo najdenega ustreznega prevoda.

lažje pritegniti k sodelovanju. Ideja *nichsourcinga* je lahko primernejša od *crowdsourcinga*, saj se med strokovnjaki poraja dvom o zanesljivosti, kvaliteti in resničnosti podatkov in opisov, pridobljenih od široke množice anonimnih ljudi (Proctor in Ziebarth, 2017). Dvome poraja tudi dejstvo, da ti podatki izvirajo iz osebnih sodb, interpretacij, presejanji so skozi sito vrednot posameznika in pogosto močno čustveno zaznamovani. Takšni opisi pa lahko zavajajo in popačijo percepcijo podane informacije (ibid). Ko se definira potreba po specifičnem znanju o določeni vsebini in je kvaliteta zbranih metapodatkov pomembna, je torej boljša izbira *nichsourcing* (Zlodi in Ivanjko, 2013), vendar termin v praksi ni zaživel. Tudi Owens opominja, da je prostovoljstvo že dolgoletna praksa v AKM in nikoli ni vključevalo velike množice ljudi (Eveleigh, 2014). Pri odločitvi katero od metod uporabiti pa je potrebno najprej ugotoviti kako kompleksna je naloga, kakšen končni rezultat želimo in kakšne sodelavce potrebujemo (de Boer et al., 2012).

## ŠTUDIJA PRIMERA: TRANSCRIBE BENTHAM

Primer enostavnega vključevanja javnosti v muzejsko delo je opisovanje fotografij, ki jih muzeji hranijo v fototekah. Z objavo fotografije na ustrezni spletni platformi, ki podpira dodajanje teksta, označevanje in ocenjevanje, lahko uporabniki prepoznavajo osebe na fotografiji, locirajo in datirajo posnet dogodek, pripišejo anekdote povezane z njim in ovrednotijo njegov pomen za lokalno skupnost. Tak primer je angleška platforma *Art Detective*, katere cilj je izboljšanje vedenja o državnih javnih zbirkah umetnin. Je neke vrste spletni forum, namenjen tako strokovnjakom kot zainteresirani javnosti, ki preko javne razprave, rešuje vprašanja o umetniških delih.

Kompleksnejši primer dela množic pa je projekt *Transcribe Bentham*. Gre za javno prepisovanje rokopisov filozofa in reformatorja Jeremyja Benthama (1748–1832), ki se je začelo marca 2010 in traja še danes. Do začetka projekta je bila prepisana samo tretjina rokopisov, ki ni mogla v celoti posredovati razumevanja Benthamove misli in njegovega zgodovinskega pomena. Leta 1959 se je začel poskus odpravljanja te pomanjkljivosti z oblikovanjem projekta Bentham Project na University College London. Ta hrani okoli 60,000 rokopisnih folijev, medtem ko jih British Library hrani še nadaljnjih 12,500. Do začetka projekta Transcribe Bentham je bilo transkribiranih okoli 28,000 folijev, vsebina ostalih pa je ostala dolga leta neznana in kot taka nedostopna (Causer et al., 2014).

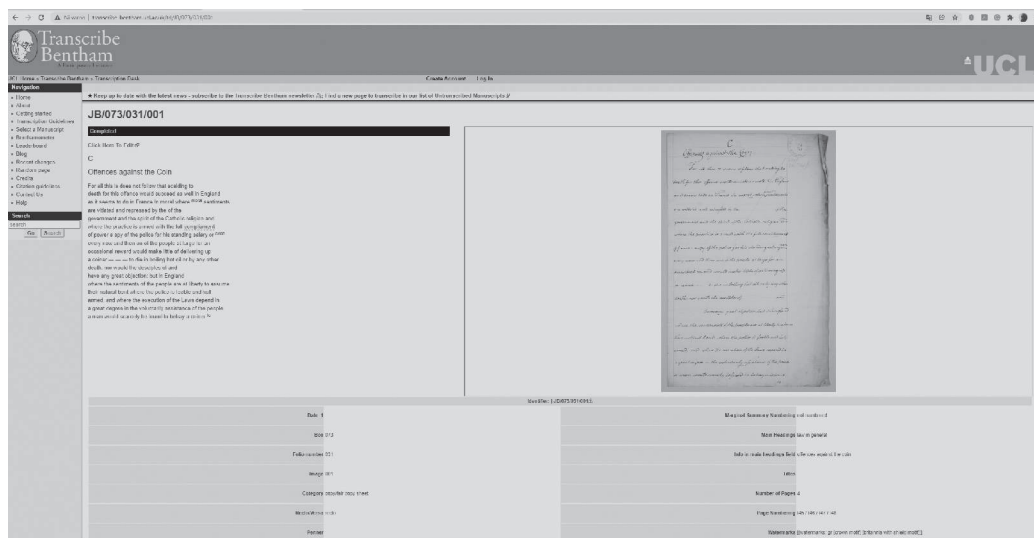
Zato je bil namen projekta da ustvari transkripcijo zapisov, ki bodo brezplačno dostopni na digitalnem repozitoriju in, da se prostovoljcem omogoči sodelovanje pri humanistični raziskavi ter možnih novih odkritjih. Tretji vidik projekta je bil eksperimentalen in kot tak odpiral mnogo vprašanj: ali bodo prostovoljci zmogli dešifrirati Benthamov rokopis in prepoznati njegove strukturne ter kompozicijske značilnosti, ali bo delo prostovoljcev dovolj kvalitetno za uredniški pregled in objavo na digitalnem repozitoriju in, ali se bo projekt izplačal v smislu stroškov in vložnega časa (ibid)?

Projekt je bil zasnovan in izveden v treh fazah. V prvi, testni fazi, je potekalo digitaliziranje rokopisov in vzpostavitev spletne platforme. Sodelovalo je 1,222 prostovoljcev od katerih je bil redno sodelujoči samo eden, ostali pa so sodelovali sporadično. V tej fazi je bilo prepisanih 1,009 folijev. Nekaj člankov v *New York Times* in *Sunday Times* ter nagrada *Ars Electronica* 2011 so vplivali na prepoznavnost projekta in vse večje število sodelujočih prostovoljcev. V drugi fazi so se izvajalci projekta osredotočali na razumevanje motivacije prostovoljcev in njihove težave pri transkribiranju. V tretji razvojni fazi projekta pa so bile vzpostavljene praktične izboljšave prikaza posameznega rokopisa (povečanje, rotacija rokopisa), ki so olajšale delo prostovoljcev in povečale njihovo učinkovitost.

Participativna spletna platforma ponuja vse informacije o projektu, navodila za sodelujoče, blog z novostmi o poteku projekta, navodila za citiranje, 'Benthamometer',

ki ažurno sporoča stanje in status transkribiranih rokopisov ter center za pomoč uporabnikom. Vsak prostovoljec, ki se prijavi na spletni strani, se spozna z načinom dela in si izbere rokopis za transkripcijo. Rokopise lahko izbira po vsebini, časovnem obdobju, težavnostni stopnji, številki arhivske škatle, lahko izbere že delno transkribiran rokopis ali pa ga izbere povsem naključno.

Ko prostovoljec odpre transkripcijsko opravilno vrstico se mu prikaže rokopis, ki ga je mogoče kvalitetno povečati ali pomanjšati. Na levi je prazno besedilno polje v katerega vnese transkripcijo in jo po končanem delu shrani. To prejme urednik, ki preveri tekstovno pravilnost in pravilnost šifriranja strukturnih lastnosti besedila, kot so: prelomi vrstic in strani, odstavki, naslovi ter kompozicijske lastnosti, kot so: podčrtane in prečrtane besede ter vrinjene besede in obrobne opombe. Ko transkribiran tekst več ne vsebuje nejasnih ali manjkajočih besed, urednik transkripcijo potrdi in zaklene dostop do nje (Causser et al., 2014).



**Slika 1: Spletna stran Transcribe Bentham z opravilno vrstico za transkripcijo rokopisa (vir: Transcribe Bentham, n. d.)**

Prostovoljci so imeli sprva težave z dešifriranjem rokopisov, vendar so s stalnimi tehnološkimi nadgradnjami premostili te ovire, redni prepisovalci pa so se priučili tudi sloga Benthamove pisave. Snavalci projekta Transcribe Bentham, ga opisujejo za uspešnega, s 3,900 do 5,200 prepisanih rokopisov na leto<sup>13</sup>. V digitalizacijo, razvoj programske opreme in plače zaposlenih je bilo investiranih nekaj manj kot £600,000. Plače potencialnih zaposlenih, ki bi transkribirali rokopise pa so bile ocenjene na dodatnih £1,000,000, vendar je to delo opravila množica prostovoljcev brezplačno. Oblikovalci projekta so še poudarili, da so kvaliteto transkripcij pregledovali izkušeni raziskovalci in potrdili, da je bilo delo v 95% odlično opravljeno (Causser in Terras, 2014). Druge ustanove, bi za transkribiranje rokopisov zaposlile izkušeno osebje, vendar je bil za kaj takega projekt Transcribe Bentham preobsežen (ibid). Iz tega sledi sklep, da je bil projekt, glede na željeni cilj, dobro zasnovan in prinesel zadovoljive rezultate.

<sup>13</sup> Podatek je bil merjen v obdobju med septembrom 2010 in julijem 2013. Iz tega sledi, da bi bilo hipotetično mogoče, da bi bil projekt zaključen do leta 2030.

## ZAKLJUČEK

Kot sta pokazala študija literature in primera, je vsak participativen projekt zasnovan v okviru teoretičnih smernic, ki so bile pripravljene na podlagi praktičnih primerov in participativne etike. Smernice pa niso navodila za izvedbo participativnega projekta pač pa iztočnice, ki se jih uporabi pri snovanju lastnega projekta. Vsak projekt je namreč treba zasnovati glede na željene cilje, strokovne pogoje in pravne okvirje posamezne dediščinske dejavnosti. Uspeh projekta je odvisen tudi od transparentnosti do publike, ravni vzpostavljenega zaupanja med sodelujočimi in ustanovo, ki mora jasno osmisliti namen in cilje. Primer Transcribe Bentham je pokazal, da snovanje projekta poteka po fazah in da je z redno sodelujočo publiko potrebno graditi vzajemen odnos.

V raziskavi smo prikazali nekatere probleme participativnih projektov, ki vplivajo na spremenjeno delovanje ustanove, saj mora ta jasno določiti raven participacije, ugotoviti način moderiranja projekta in razmisliti kako se bo lotevala konfliktov, ki lahko nastopijo zaradi prevelikih oz. drugačnih pričakovanj publike.

Pa vendar je bilo preko raziskave ugotovljeno, da so participativne metode dela bogat doprinos kulturnim ustanovam. Kljub temu, da so v kulturnem prostoru zahodnega sveta že stalna praksa, je v Sloveniji malo ustanov, ki jih vpeljujejo v svoje delovanje. Največkrat se jih poslužujejo muzejske ustanove, ki imajo v svoji zaposlitveni strukturi primerno izobražen kader ter v poslanstvu izraženo namero, da usmerjeno razvijajo svoja občinstva tudi s participativnostjo. Glavni postulat participativnega delovanja je poleg pridobljenega gradiva in opravljenega dela tudi socialna vrednota, ki uporabnike poveže z ustanovo in zadovoljstvo, ko opravijo neko delo za skupno dobro.

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## Summary

*In institutions that manage heritage, there is always a certain amount of unprocessed material waiting to be digitized. Mostly there are not enough experts who have access to material processing and metadata entry into documentation system and time available to do it. For more than a decade, some institutions have been solving this problem with participatory projects, which include volunteers, through an open call. We researched crowdsourcing, as one of the participatory methods and explained its conceptual frameworks. We presented a project design and practical example that confirm the hypothesis that participatory methods contribute to archives, libraries, museums and galleries (abbreviation GLAM).*

*By reviewing the scientific and professional literature and case studies, we presented the practical applicability of crowdsourcing methods in GLAM institutions and presented the most important elements in the design of such a project, which most often serves as a tool for digitization and processing of large amount of data. We present the findings that while designing, each individual project needs to be adjusted, depending on the type of institution, the purpose of the project, the audience we address and the result we want to achieve.*

In this paper, we also present the problem of the term crowdsourcing in cultural heritage domain, which was first identified in 2006 as a business model and only afterwards as a practical tool for gathering knowledge in heritage institutions. In practice, it has been shown that in such a project, the most motivated volunteers are those who do ninety percent of work because they are personally interested in the topic and want to contribute to the common goal and the public good. Therefore, some researchers suggest the term *nichsourcing* as more appropriate, which, however, has not come to life in practice. As an example, we presented the English participatory project *Transcribe Bentham*, which has been successfully implemented since 2010 and is still ongoing. The designers of the project created an open platform and asked the public for their help in transcribing over 60,000 folios of the English philosopher and reformer Jeremy Bentham (1748-1832). The current result of the project is 48.45 percent of the transcribed Bentham's folios available online to researchers and the interested public.

We found that participatory methods of work are rarely present in the workflow of Slovenian heritage institutions, while in some Anglo-Saxon countries there is already an established practice that contributes to a greater amount of work done and greater access to material. This though is essential when we want to answer why embark on such a project. Participatory projects enrich the institution and its visitors, as they build the trust and devotion of users and (virtual) communities that are actively involved in its operation through transparency and accessibility.

*Typology: 1.01 Original scientific research*

Anja Prša<sup>1</sup>

## PROCESS OF APPRAISAL FOR BUSINESS RECORDS

### Abstract

**Purpose:** In this paper the author seeks to examine process of appraisal for business records. Communications of legal entities in the business world are based on business records. Business processes are carried out by records that contain correct, accurate and timely information. Various records are created, collected and used during business of legal entities, which must be authentic, reliable, useful and stored in order to support the operation of the organisation. Process of appraisal for business records in relation to setting retention periods causes a number of problems in terms of organisation and implementation of this task.

**Methodology/approach:** For purpose of this article the author uses a description method to provide an overview of previous professional findings regarding records management and appraisal for business records. A review of standards relating to the appraisal for records management and managing records is also included.

**Results:** Process of appraisal for business records is related to setting retention periods. However, process of appraisal for business records is much more than that. It is comprehensive overview of records management, business activities and identification of the legal framework that affects the execution of business activities.

**Conclusion/Findings:** Appraisal for business records and records management must be a continuous improvement cycle, where the value of records is determined by analysing business processes, legal requirements and relevance to the organisation's operations.

**Keywords:** business records, retention periods, records management, appraisal

## PROCESSO DI VALUTAZIONE PER I DOCUMENTI AZIENDALI

### Abstract

**Scopo:** In questo articolo l'autore cerca di esaminare il processo di valutazione per i documenti aziendali. Le comunicazioni delle persone giuridiche nel mondo degli affari si basano sui documenti aziendali. I processi aziendali sono eseguiti da registrazioni che contengono informazioni corrette, accurate e tempestive. Vari record vengono creati, raccolti e utilizzati durante l'attività delle persone giuridiche, che devono essere autentici, affidabili, utili e archiviati per supportare il funzionamento dell'organizzazione. Il processo di valutazione dei documenti aziendali in relazione all'impostazione dei periodi di conservazione causa una serie di problemi in termini di organizzazione e attuazione di questo compito.

**Metodologia/approccio:** Ai fini di questo articolo, l'autore utilizza un metodo di descrizione per fornire una panoramica delle precedenti scoperte professionali riguardanti la gestione dei record e la valutazione dei record aziendali. È inclusa anche una revisione degli standard relativi alla valutazione per la gestione dei record e la gestione dei record.

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**Risultati:** il processo di valutazione dei record aziendali è correlato all'impostazione dei periodi di conservazione. Tuttavia, il processo di valutazione per i documenti aziendali è molto più di questo. È una panoramica completa della gestione dei record, delle attività commerciali e dell'identificazione del quadro giuridico che influisce sull'esecuzione delle attività commerciali.

**Conclusione/risultati:** la valutazione dei record aziendali e della gestione dei record deve essere un ciclo di miglioramento continuo, in cui il valore dei record è determinato da analisi dei processi aziendali, requisiti legali e rilevanza per le operazioni dell'organizzazione.

**Parole chiave:** documenti aziendali, periodi di conservazione, gestione dei documenti, valutazione

## PROCES VREDNOTENJA POSLOVNE DOKUMENTACIJE

### Izvleček

**Namen:** Komunikacija pravnih oseb v poslovnem svetu temelji na poslovnih dokumentih. Z dokumenti se posredujejo pravilne, natančne, pravočasne informacije in vodijo poslovni procesi. Tekom poslovanja pravnih oseb nastajajo, se uporabljajo in zbirajo raznovrstni dokumenti oziroma zapisi, ki morajo biti avtentični, zanesljivi, uporabni in hranjeni, da podpirajo delovanje organizacije. Postopek vrednotenja poslovne dokumentacije pravnih oseb v zvezi z določanjem rokov hranjenja povzroča številne težave v smislu organizacije in izvedbe tega opravila. Avtorica v prispevku raziskuje postopek vrednotenja poslovne dokumentacije.

**Metoda/pristop:** V prispevku je z metodo deskripcije podan pregled dosedanjih strokovnih ugotovitev glede pisarniškega poslovanja in vrednotenja poslovne dokumentacije. Vključen je tudi pregled standardov, ki se nanašajo na vrednotenje poslovne dokumentacije in upravljanja zapisov.

**Rezultati:** Postopek vrednotenja poslovne dokumentacije ni zgolj določanje rokov hrambe, ampak obsega celovit pregled pisarniškega poslovanja, poslovnih aktivnosti organizacije ter identifikacijo pravnega okvirja, ki vpliva na izvajanje poslovnih aktivnosti.

**Sklep/ugotovitev:** Vrednotenje poslovne dokumentacije in poslovnih procesov ne sme biti začrtan in okostenel proces, ampak vedno znova ponavljajoč se postopek, pri katerem se z analizo poslovnih postopkov, zakonskih zahtev in relevantnosti za poslovanje podjetja določi vrednost poslovne dokumentacije.

**Ključne besede:** poslovna dokumentacija, roki hranjenja, pisarniško poslovanje, vrednotenje.



## UVOD

Komunikacija pravnih oseb v poslovnem svetu temelji na poslovnih dokumentih. Z dokumenti se posredujejo pravilne, natančne, pravočasne informacije in vodijo poslovni procesi. Pisarniško poslovanje, ki ga sestavljajo različni delovni postopki, je ena od pomožnih dejavnosti, ki jih opravlja vsaka pravna oseba poleg svoje osnovne dejavnosti. Glavna naloga pisarniškega poslovanja je upravljanje z zapisi. Obsega pripravo, vnos, obdelavo, hrambo, spreminjanje, varovanje in prenos informacij, ki jih uporabnik potrebuje za odločanje. Med te naloge sodijo sprejem in oddaja pošte, klasificiranje in signiranje dokumentov, vodenje evidenc o zadevah in dokumentih, vodenje tekoče in stalne zbirke ... (Žumer 2008, str. 26). Vsak poslovni dogodek oziroma postopek je treba dokumentirati in voditi nadzor nad dokumenti, sicer se lahko pomembne informacije izgubijo.

Pisarniški postopki in sistemi se med seboj razlikujejo tako v teoriji kot v praksi. Generalno lahko pisarniško poslovanje razdelimo v dve večji skupini – centralizirano in decentralizirano pisarniško poslovanje. Centraliziran pristop je značilen za upravne organe (javni zavodi, vzgojno-izobraževalni zavodi, zdravstvene ustanove, kulturni zavodi, občine, upravne enote ...), v katerih poteka sprejem, evidentiranje, signiranje odprava pošte in arhiviranje preko enega mesta, ki je običajno glavna pisarna oziroma tajništvo (Žumer 2001, str. 86). Pri decentraliziranem pristopu pisarniško poslovanje ne poteka preko skupne centralne točke. Preko skupne točke lahko poteka prejem in odprava pošte. Žumer (2001, str. 86) pravi, da je bistvo decentraliziranega pristopa v razdelitvi ravnanja s poslovno dokumentacijo na posamezne notranje organizacijske enote, ki z njo samostojno upravljajo in tudi arhivirajo. Decentraliziran pristop je značilen predvsem za gospodarski sektor (zavarovalnice, podjetja, banke ...). Z digitalizacijo poslovnih procesov in uvajanjem elektronskih sistemov upravljanja dokumentov (ang. *Electronic Document Management System – EDMS*), se uvajajo različne programske rešitve, ki so namenjene organiziranju in predvsem hrambi dokumentov, ki nastajajo pri poslovanju. Ti sistemi so zasnovani tako, da centralizirano hranijo večje količine elektronskih dokumentov in omogočajo učinkovit dostop do njih (Techopedia 2021).

Pisarniško poslovanje za javnopravne osebe podrobno ureja zakonodaja, natančneje Uredba o upravnem poslovanju (2018), medtem ko pri pravnih osebah zasebnega prava ni predpisa, ki bi celovito določal pravila pisarniškega poslovanja. Pravne osebe zasebnega prava lahko svoje pisarniško poslovanje opredelijo z internimi akti, kot so pravilniki in poslovniki, ter uskladijo z ISO standardi, ki se nanašajo na pisarniško poslovanje. Postopki upravljanja papirnate dokumentacije so v veliki meri poenostavljeni in v nasprotju s predpisi, kar privede do neurejenosti, slabe dostopnosti in izgube nadzora nad arhiviranim gradivom. Z uvajanjem elektronskega poslovanja in elektronske hrambe se nadzor nad hranjenim gradivom izboljšuje, saj je treba za uvedbo teh sistemov nujno urediti pisarniško poslovanje (Žumer 2011, str. 126).

## VREDNOTENJE POSLOVNE DOKUMENTACIJE IN ROKI HRAMBE

### 2.1 DOKUMENT IN UPRAVLJANJE Z DOKUMENTI

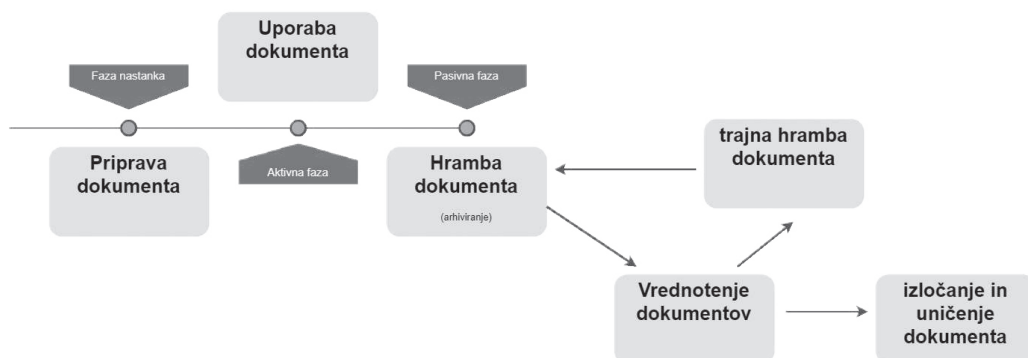
Dokument je izviren ali reproduciran zapis na katerem koli nosilcu (fizični ali elektronski), ki je bil prejet ali je nastal pri delu organa in je pomemben za njegovo poslovanje (Uredba o upravnem poslovanju 2020, 6. člen) in je temeljna enota dokumentarnega gradiva. Bizjak (2003, str. 119) poudarja, da dokumenti vsebujejo informacije, ki so dragoceni vir in pomembna poslovna lastnina. Marinko (2013) pa zagovarja, da je poslovna dokumentacija eno od najpomembnejših orodij komuniciranja, poslovni dokumenti pa

pomagajo voditi poslovne procese ter vplivajo na način mišljenja in dela. Dokumentarno gradivo oziroma poslovna dokumentacija je torej dokaz poslovne dejavnosti in tudi pomemben vir informacij (Semlič Rajh 2018, str. 47).

Marinko (2013a, str. 88) poudarja, da dokumente razlikujemo po vsebini, zaupnosti, avtorju in zvrsti ter nadaljuje, da po namenu razlikujemo prejete dokumente, lastne dokumente organizacije in odposlane dokumente. Po zvrsti razlikujemo poslovne dokumente (ki jih organizacije izmenjujejo v poslovnih procesih) in uradne dokumente (ki jih prejemajo, odpošiljajo in obravnavajo državni organi).

Dokumenti imajo v svojem življenjskem ciklu različno vrednost oziroma pomen. Borglund in Öberg (2006, str. 5) po Shellenbergovi teoriji ločita pomen dokumenta na primarni in sekundarni pomen – torej glede na namen uporabe.. Primarni pomen ima dokument takrat, ko služi dokazni vrednosti in je podpora poslovnim aktivnostim pravne osebe oziroma je potreben za operativne naloge. Sekundarni pomen dokumenta nastopi takrat, ko se uporablja za namene raziskav in je posnetek preteklosti.

Vsak dokument ima svoj življenjski cikel, v katerem prehaja čez različne faze, kot je razvidno iz Slike 1. Življenjski cikel dokumenta se začne v fazi priprave dokumenta, ko se ta ustvari, in konča v fazi arhiviranja. V prvi fazi (faza nastanka) je dokument ustvarjen. Ko je dokument v uporabi, preide v aktivno fazo. Kasneje uporaba postaja vse redkejša. Zadnja faza nastopi, ko je dokument neaktiven in ni v uporabi. V tej fazi se po preteku zakonskih rokov hranjenja večina dokumentov uniči (Understanding Records Management s. d.) ali se hrani trajno. V primeru javnopравnih oseb se v tej fazi dokumentarno gradivo odbere in pripravi za izročitev v pristojni arhiv.



**Slika 1: Prikaz faz življenjskega cikla dokumenta.**

Vir: Understanding Records Management (<https://archives.un.org/fr/content/understanding-records-management>).

Bistvo urejenega pisarniškega poslovanja je sledenje dokumentu skozi vse faze njegovega življenjskega cikla (Life Cycle of Records Management 2020). Dokumenti nastanejo in se aktivno uporabljajo v zvezi z namenom svojega nastanka. Ko dokument izgubi svoj primarni pomen, je treba sprejeti odločitev ali se ga ohrani ali uniči.

V procesu pisarniškega poslovanja se dokumente združuje v osnovne enote po različnih principih in so podlaga za evidentiranje v pisarniških evidencah. Žumer (2001, str. 56–57) je razdelil osnovne enote združevanja dokumentov na:

- **posamezni dokument** (zapisnik, statut, dopis, pogodba ...),
- **spis** (dopis in odgovor glede iste zadeve),
- **zadeva** (združeni dokumenti, ki se nanašajo na isto temo ali na isto vsebino ene pravne ali fizične osebe),

- **dosje** (združeni dokumenti in zadeve, ki se nanašajo na isto pravno osebo ali istovrstni dokumenti z različno vsebino),
- **sodni spis** (združena sodna pisanja, ki se nanašajo na isto vsebino ene pravne ali fizične osebe).

Osnovne enote združevanja dokumentov se v skladu s sistemom pisarniškega poslovanja razvrščajo na različne načine: kronološko, vsebinsko, abecedno, številčno ... (Žumer 2001, str. 63). Klasinc (2000) dodaja, da se pri urejanju sistema poslovne dokumentacije upošteva dejavnost podjetja, njegovo organizacijo, posebne naloge, pomembne predmete poslovanja, posamezne pomembne funkcije in izredne dejavnosti. V praksi so sistemi odlaganja dokumentacije kombinacija več načinov razvrščanja<sup>2</sup>. Kot osnova se uporablja številčno kronološki način ali sistem razvrščanja na podlagi klasifikacijskega načrta.

Klasifikacijski načrt je nepogrešljiv pripomoček tako pri klasičnem upravljanju oziroma hrambi dokumentacije na papirju, kot tudi pri elektronskem upravljanju in e-hrambi (Zdovc 2014). Žumer (2001, str. 129) predlaga, da splošni model klasifikacijskega načrta vsebuje sistematično nivojsko razčlenitev, ki jo opredeljujejo stvarna pristojnost, poslovne funkcije, procesi poslovanja, dejavnosti in predmet poslovanja. Za osnovo klasifikacijskega načrta odsvetuje organizacijsko strukturo. Klasifikacijski načrt ne sme biti zapleten in mora biti jasen vsem, ki upravljajo z dokumenti. Vsebovati mora klasifikacijske znake, kratek in jasen opis klasifikacijskega znaka, roke hrambe in podrobnejšo obrazložitev vrst dokumentacije posameznega klasifikacijskega znaka. V primeru javnopravnih oseb pa tudi določitev arhivskega gradiva s strani pristojnega arhiva.

Ključni razlogi za upravljanje dokumentov so odgovornost, učinkovito poslovanje, zaščita pravic in sposobnost rekonstrukcije preteklosti (Semlič Rajh 2018, str. 47). Upravljanje dokumentov zato vključuje tudi njihovo ustrezno hrambo. Tekom življenjskega cikla se dokumenti hranijo v tekoči, stalni in zbirki nerešenih zadev. Uredba o upravnem poslovanju (2018, 69.–73. člen) definira lastnosti vsake zbirke dokumentarnega gradiva. Dokument se nahaja v zbirki nerešenih zadev od nastanka do takrat, ko je zadeva, za katero je bil ustvarjen, rešena, torej v fazi nastanka in v aktivni fazi dokumenta. Z rešitvijo zadeve preide dokument v tekočo zbirko. Rešene zadeve je treba pred vložitvijo v tekočo zbirko še urediti (izločiti dokumente, ki niso del zadeve, npr. kopije, pomožne obrazce ...), pregledati elektronske dokumente ali so ustrezno evidentirani ter označiti roke hrambe. V tekoči zbirki se rešene zadeve hranijo dve leti po rešitvi, nato se dokumentacija prenese v stalno zbirko. Tekoča zbirka in zbirka nerešenih zadev se hranita v pisarniških prostorih, saj je tovrstna dokumentacija še vedno pomembna za poslovanje pravne osebe. Stalna zbirka dokumentarnega gradiva se hrani večinoma v posebnem, ločenem prostoru t. i. arhivu. V stalni zbirki se hrani vso dokumentarno gradivo ali dokumentacija, ki ima rok hrambe daljši kot dve leti do izteka rokov hrambe. Gradivo v fizični obliki se v stalni zbirki hrani urejeno in v ustrezni opremi (arhivske škatle, fascikli, registratorji), ki omogočajo materialno varnost gradivu.

## VREDNOTENJE POSLOVNE DOKUMENTACIJE

Žumer (2008, str. 36) je vrednotenje definiral kot proces ugotavljanja in določanja pomena in vrednosti, ki jo ima gradivo glede na znanost, kulturo ali pravno varnost pravnih in fizičnih oseb. Proces vrednotenja ni zgolj določanje arhivske vrednosti dokumentarnemu gradivu, ampak je tudi proces, s katerim se ovrednoti poslovna dokumentacija. ISO 15489-1:2016 Information and Documentation – Records Management Part 1: Con-

<sup>2</sup> Več o načinih razvrščanja in urejanja gradiva pri pisarniškem poslovanju glej Žumer 2001, str. 62–74.

cepts and Principles (dalje: ISO 2016) vrednotenje pojasnjuje kot analizo poslovnega konteksta, poslovne dejavnosti in tveganj z namenom odločanja, kateri dokumenti morajo znotraj teh nastati ali zajeti ter kako dolgo jih je treba hraniti in zagotoviti njihovo ustrezno upravljanje (Semlič Rajh 2018, str. 49). Semlič Rajh (2018, str. 44) poudarja še naslednje definicije vrednotenja:

- Društvo ameriških arhivistov: proces ugotavljanja, ali ima dokumentarno in drugo gradivo stalno vrednost. Je postopek določitve časovnega obdobja, v katerem je treba hraniti gradivo na osnovi zakonodaje in njegove potencialne uporabnosti.
- Slovar arhivske terminologije Mednarodnega arhivskega sveta: osnovna funkcija upravljanja dokumentarnega gradiva, kjer se določa vrednost gradivu in s tem tudi izločanje dokumentarnega gradiva na osnovi njegove trenutne upravne, pravne in davčne uporabe, njegove dokazne in informativne vrednosti, ...
- Mednarodni standard za popisovanje arhivskega gradiva ISADg2: proces določanja rokov hrambe dokumentarnemu gradivu.

Pri tem pomembnem strokovnem opravilu morajo arhivisti upoštevati in poznati izhodišča vrednotenja, kot so struktura, organizacija in sistem pisarniškega poslovanja institucij ter zvrsti gradiva, ki nastajajo pri poslovanju. Analizirati je treba posamezne zvrsti gradiva glede na njihov trajni pomen za znanost, kulturo in pravno varnost (Žumer 1995, str. 11). Enako velja tudi za vrednotenje dokumentarnega gradiva oziroma poslovne dokumentacije z določanjem rokov hrambe. Vodstvo podjetja ali organizacije oziroma pravne osebe zasebnega prava, ki določa roke hrambe svoje dokumentacije, mora dobro poznati področno zakonodajo, sistem pisarniškega poslovanja, poslovne procese in zvrsti gradiva, ki pri tem nastajajo. Z elektronskim poslovanjem se vrednotenje gradiva oziroma določanje rokov hrambe zgodi ob samem nastanku dokumenta, čemur je treba posvetiti več pozornosti. Marinko (2013) poudarja, da je pri poslovni dokumentaciji bistveno prepoznati, kdaj je informacija potrebna, in imeti sposobnost informacijo najti, ovrednotiti in učinkovito uporabiti.,

## **ROKI HRAMBE**

Poslovna dokumentacija se vrednoti z določanjem rokov hrambe. Mnenja o tem, kateri dokumenti so pomembni, so zelo različna, saj nastajajo na različnih področjih (Marinko 2013).

Žumer (2001, str. 49) definira roke hrambe kot časovno opredeljena obdobja, do katerih je treba dokumentarno gradivo hraniti zaradi predpisanih rokov hranjenja ali zaradi potreb poslovanja in dela ustanov. Dodaja, da je za določanje in spoštovanje le-teh odgovorna izključno ustanova sama.

Roke hrambe predpisuje zakonodaja (Zakon o računovodstvu, Zakon o gospodarskih družbah, Zakon o davku na dodano vrednost, Slovenski računovodski standardi, Zakon o davčnem postopku, Zakon o evidencah na področju dela in socialne varnosti ...). Uredba o upravnem poslovanju (2018, 78. člen) glede rokov hranjenja pravi, da se v primeru neobstoja predpisov, ki neposredno določajo roke hrambe, ti določijo v skladu z veljavnimi predpisi, na podlagi katerih je mogoče predvideti roke hrambe. Če tudi ti predpisi ne obstajajo, se roki hrambe določijo s konkretnimi potrebami poslovanja in s predvidevanjem o tem, koliko časa se bo gradivo uporabljalo za poslovanje in delo. Uredba o upravnem poslovanju (2018) sicer ne zavezuje pravnih oseb zasebnega prava, a se ti lahko pri določanju rokov hrambe (in sami ureditvi poslovanja) smiselno uprejo na prej omenjen predpis.

Roki hrambe se označujejo z veliko črko A za arhivsko gradivo, z veliko črko T za trajno gradivo ali so izraženih v letih (npr. 2, 5, 10, 15 ...). Rok hrambe začne teči 1. januarja naslednje leto, ko je zadeva rešena (Uredba o upravnem poslovanju 2018, 78. člen).

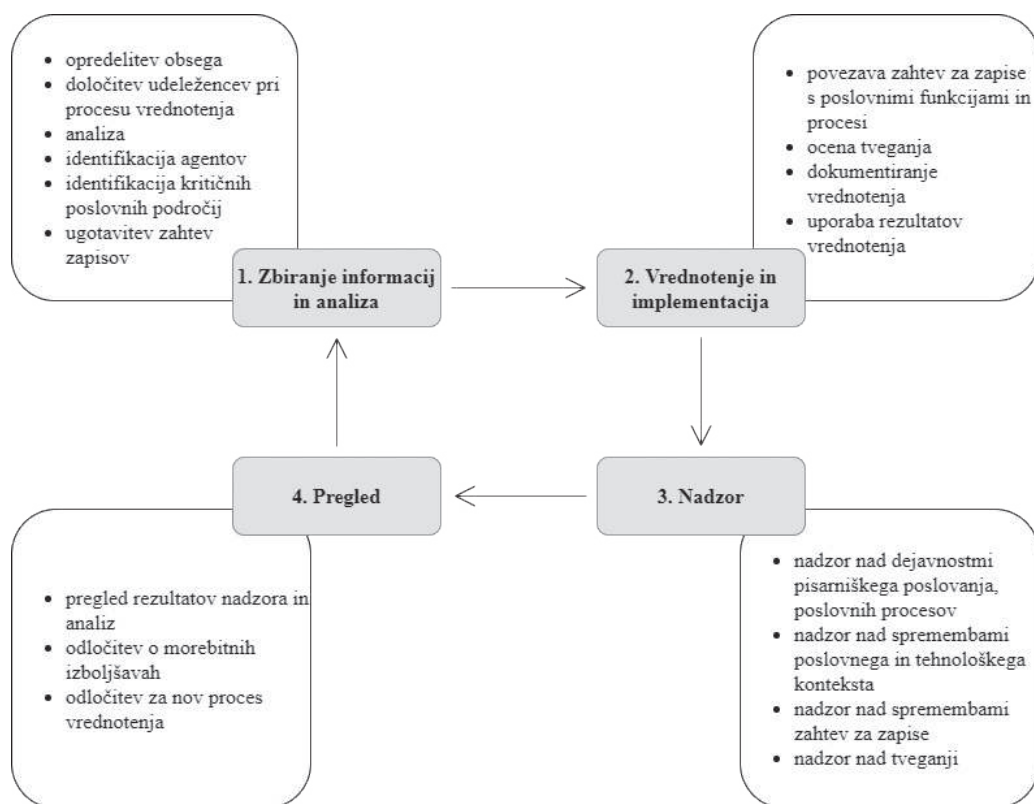
Roke hrambe je priporočljivo določiti hkrati s klasifikacijskim načrtom, če ustanove uporabljajo tak sistem pisarniškega poslovanja (Žumer 2001, str. 49) – še posebej to velja pri elektronskih sistemih poslovanja.

### VREDNOTENJE ZA UPRAVLJANJE ZAPISOV<sup>3</sup>

Tekom opravljanja poslovnih aktivnosti nastajajo, se uporabljajo in zbirajo dokumenti in zapisi, ki morajo biti avtentični, zanesljivi in uporabni, usklajeni s pravnimi okviri, da podpirajo trajno delovanje organizacije (Bizjak 2003, str. 120). Koncept in načela, na katerih temeljijo pristopi za ustvarjanje, zajemanje in upravljanje zapisov, določa standard ISO 2016. Kot že povedano, standard pojasnjuje vrednotenje kot analizo poslovnega konteksta, dejavnosti in tveganj, s katero se omogoči odločanje o tem, katere dokumente je treba ustvariti in zajeti ter zagotoviti ustrezno upravljanje zapisov v daljšem časovnem obdobju (Semlič Rajh 2018, str. 49). Standard kot glavne elemente vrednotenja navaja razumevanje narave poslovanja in njegovega pravnega, kadrovskega in tehnološkega okolja ter uporabo ocen tveganja z namenom ugotavljanja, kakšne zapise je treba ustvariti in kako jih je treba upravljati, da bi ustrezali vrsti zahtev (Semlič Rajh 2018, str. 49). Vrednotenje je treba izvajati periodično in zajeti vse morebitne spremembe (spremembe v poslovnih procesih, spremembe zakonodaje, nadgradnje sistemov, organizacijske spremembe ...), ki vplivajo na poslovanje. Upravljanje zapisov mora postati del poslovnega procesa, ne pa ločena dejavnost.

V procesu vrednotenja po načelih standarda je priporočljivo, da sodelujejo predstavniki podjetja oziroma organizacije in tudi zunanji predstavniki (Semlič Rajh 2018, str. 48). Postopek vrednotenja upravljanja z zapisi podrobneje določa tehnično poročilo ISO/TR 21946:2018: Information and Documentation – Appraisal for Managing Records (dalje: ISO/TR 2018) in je namenjen vrednotenju digitalnih zapisov.

<sup>3</sup> Ang. *Appraisal for Managing Records*. V prispevku in v naslovu poglavja je prevedena beseda *record*, ki se nanaša na ISO/TR 21946:2018 Information and Documentation – Appraisal for Managing Records, kot *zapis* in je s tem izrazom mišljen dokument.



**Slika 2: Prikaz postopka vrednotenja upravljanja z zapisi (povzeto po ISO/TR 2018).**

Postopek vrednotenja upravljanja z zapisi kot ga predvideva ISO/TR 2018 je razdeljen na štiri faze oziroma korake, kar je razvidno na Sliki 2. Prvi korak je namenjen zbiranju informacij in analizi zbranih podatkov (ISO/TR 2018, str. 3–5). Organizacija najprej določi okvir oziroma obseg vrednotenja – npr. pri združitvi podjetja je treba analizirati funkcije organizacij zaradi migracije dokumentov na nov sistem. Okvir vrednotenja bo v tem primeru obsegal poslovne funkcije obeh organizacij (ISO/TR 2018, str. 4). Nato se določijo osebe, ki bodo udeležene v postopku vrednotenja. Skupino za vrednotenje, kot določata standard in tehnično poročilo, naj sestavljajo tako predstavniki podjetja kot tudi zunanji predstavniki (ISO/TR 2018, str. 4–5). Te osebe zberejo vse informacije, kot so organizacijska shema, register tveganj, razni zapisniki delničarjev, sistemska dokumentacija, revizijska poročila itd. (ISO/TR 2018, str. 5–6). Na podlagi zbranih informacij se opravi več različnih analiz, vsako od njih pa je treba ustrezno dokumentirati. Med temi so (ISO/TR 2018, str. 6–7):

- analiza poslovnega konteksta, ki je pomembna za razumevanje, kateri poslovni procesi so potrebni za poslovanje. Iz analize poslovnega konteksta se identificira, katere zapise/dokumente je treba ustvariti oziroma zajeti za določene poslovne procese in zakaj so ti potrebni (poslovne potrebe, pravne zahteve ...);
- tehnološka analiza, s katero so analizirajo obstoječe tehnologije in pregledajo možnosti za nadgradnjo metod in orodij za ustvarjanje in zajem dokumentov;
- funkcijska analiza, s katero se analizira funkcije organizacije od strateških ciljev in namena navzdol do aktivnosti in poslovnih procesov organizacije, ki te funkcije podpirajo. Namen funkcijske analize je identificirati tveganje in zahteve zapisov skozi poslovne procese;

- zaporedna analiza, ki dopolnjuje funkcijsko analizo tako, da analizira poslovanje z vidika delovnega procesa. Zaporedna analiza je uporabna za povezovanje specifičnih zahtev dokumentov oziroma zapisov k poslovnim procesom in sistemom, v katerih nastajajo ali so zajeti.

V analize je treba vključiti tudi identifikacijo agentov<sup>4</sup>, ki so lahko individualne osebe, delovna skupina ali organizacija, ki je zadolžena za ustvarjanje, zajem zapisov ali za pisarniško poslovanje. Med agente se uvrščajo tudi tehnološka orodja oziroma aplikacije, ki ustvarjajo zapise – npr. samodejni odgovor na elektronsko sporočilo ali obvestilo o napaki (ISO/TR 2018, str. 78). V prvem koraku je treba prepoznati tudi kritična poslovna področja in določiti, kateri dokumenti morajo nastati ali biti zajeti v poslovnem procesu (ISO/TR 2018, str. 9–11).

V drugem koraku se po analizah in identifikaciji zahtevanih dokumentov ti povežejo z poslovnimi funkcijami, aktivnostmi, poslovanjem in delovnim procesom (ISO/TR 2018, str. 11–17). S tem se ustvari povezava med zahtevami in poslovnim kontekstom. Opravi se ocena tveganja in dokumentacija v zvezi z vrednotenjem. Vrednotenje mora biti dokumentirano za vsako aktivnost posebej. Tehnično poročilo priporoča, da se dokumentacija o vrednotenju strukturira, saj je tako mogoče ponovno analizirati in uporabiti podatke prejšnjega vrednotenja (ISO/TR 2018, str. 15–16).

Tretji korak vrednotenja je namenjen nadzoru. Nadzor naj bo rutinsko ocenjevanje ali so implementirani rezultati vrednotenja učinkoviti, ali je potreben ponoven postopek vrednotenja. Za učinkovit nadzor je treba določiti merilne parametre, nato metode nadzora, časovni okvir, kako pogosto se nadzor opravlja in kdaj se rezultati nadzora analizirajo (ISO/TR 2018, str. 17).

Zadnji korak je pregled rezultatov analize nadzora. V primeru, da vpeljane rešitve niso učinkovite, je za ublažitev posledic treba sprejeti odločitev za ponoven proces vrednotenja (ISO/TR 2018, str. 17).

Marinko (2013) ugotavlja, da podjetja še vedno izdelujejo številne podvajajoče se dokumente in evidence, dokumenti pa se hranijo na različnih lokacijah (npr. računovodski dokumenti v računovodstvu, kadrovske dosjeje pri vodji kadrovske ali pravne službe, pogodbe s strankami v komercialni službi ...). Na osnovni standarda ISO 2016 proces upravljanja z dokumenti zahteva premik postopka vrednotenja gradiva oziroma poslovne dokumentacije na sam začetek oziroma v fazo nastanka dokumenta, kar je bolj izrazito v sodobnem elektronskem okolju. Z vrednotenjem poslovnih procesov za posamezno področje se določi, kateri zapisi oziroma digitalni dokumenti morajo pri tem nastati in se jim hkrati določijo roki hrambe ter mesto hranjenja.

## VREDNOTENJE POSLOVNE DOKUMENTACIJE V PAPIRNI OBLIKI

Kljub temu da se vse bolj uveljavlja elektronsko in brezpapirno poslovanje, kjer je uporaba prej predstavljenega postopka vrednotenja upravljanja z zapisi zaželena, če ne nujna, se v stalnih zbirkah pravnih oseb še vedno hrani dokumentacija v papirni obliki. Tudi za to gradivo lahko uporabimo prej predstavljen model.

Pravne osebe zasebnega prava se večinoma pričnejo ukvarjati z vrednotenjem poslovne dokumentacije šele, ko jim kronično začne primanjkovati prostora za hrambo dokumentacije in je treba urediti arhiv ali potrebujejo določeno dokumentacijo za uveljavljanje pravic v kakšnem upravnem ali pravnem postopku. Svojo poslovno dokumentacijo

<sup>4</sup> Definicija izraza agenti je razložena v ISO 2016, str. 1. Kot agenti so mišljeni ustvarjalci gradiva – pravne in fizične osebe ter družine (ISAAR/CFP).

vrednotijo za nazaj in ne ob njenem nastanku, kot predlagata ISO 2016 in ISO/TR 2018. Kot trdi Marinko (2013a, str. 94) pa se okrog 85 % arhiviranih dokumentov nikoli več ne uporabi.

Za učinkovito vrednotenje poslovne dokumentacije je treba določiti merila vrednotenja. Za primer, ko se določa arhivsko gradivo iz dokumentarnega, so merila za vrednotenje določena v Zakonu o varstvu dokumentarnega in arhivskega gradiva ter arhivih (2014, 40. člen):

- potrebe zgodovinskega, drugih znanosti in kulture;
- potrebe za trajno pravno veljavo za doseganje pravic oseb;
- pomembnost vsebine gradiva;
- specifičnost dogodkov in pojavov v določenem času;
- specifičnost kraja ali območja;
- pomen javno pravne osebe;
- pomen avtorja;
- pomen gradiva z vidika kulturne raznolikosti;
- izvirnost dokumentov;
- izvirnost podatkov in informacij;
- reprezentativni izbor;
- notranje in zunanje značilnosti gradiva in
- druga merila, ki jih določi pristojni arhiv.

Pri pravnih osebah zasebnega prava sicer redko govorimo o določanju javnega arhivskega gradiva, vendar si lahko pri vrednotenju poslovne dokumentacije pomagamo z merili vrednotenja po ZVDAGA. Pri vrednotenju poslovne dokumentacije je dobro poudariti naslednja merila:

- pomembnost vsebine gradiva (za potrebe poslovanja);
- potrebe za trajno pravno veljavo za doseganje pravic oseb (pravna varnost podjetja in zaposlenih);
- izpolnjevanje zakonskih potreb.

Kot je priporočeno v postopku vrednotenja upravljanja z zapisi ISO/TR 2018, naj se v vrednotenju poslovne dokumentacije vključi več ljudi, predvsem pa tiste zaposlene, ki dnevno delajo z dokumentacijo, poznajo njeno vsebino ter pravne posledice. Vrednotenje se je treba lotiti sistematično, postopno in jasno določiti njegov obseg (npr. računovodska dokumentacija). Nato se morajo pregledati poslovni procesi znotraj določenega obsega vrednotenja in dokumentacija, ki je nastala (izdani računi, dobavnice, pogodbe, zaključni računi, bilance ... ), ter analizirati vsa področna zakonodaja, ki se nanaša na dokumentacijo. Pred dokončno določitvijo rokov hrambe treba še oceniti, koliko časa je dokument potreben za poslovanje podjetja. Zakonsko določene roke hrambe se lahko podaljša, če pravna oseba smatra, da je podaljšanje pomembno za njeno poslovanje. Nikakor pa jih ni dovoljeno krajšati.

## ZAKLJUČEK

Vrednotenje poslovne dokumentacije je proces, s katerim se določa vrednost dokumentov z določanjem rokov hrambe. Vodstvo podjetja, organizacije oziroma pravne osebe zasebnega prava, ki določajo roke hrambe svoje dokumentacije, morajo dobro poznati področno zakonodajo, sistem pisarniškega poslovanja ter poslovne procese in



zvrsti gradiva, ki pri tem nastajajo. Standard ISO 2016 in tehnično poročilo ISO/TR 2018 priporočata, da se v proces vrednotenja poslovne dokumentacije vključi več ljudi, predvsem tiste, ki z dokumentacijo delajo in jo poznajo. Ne glede na to ali se vrednoti poslovna dokumentacija v elektronski ali v papirni obliki, je treba določiti in upoštevati merila. Merila vrednotenja lahko pravna oseba določi sama in glede na potrebe poslovanja. Pri vrednotenju poslovne dokumentacije je dobro poudariti osnovna merila, kot so: pomembnost vsebine gradiva (za potrebe poslovanja); potrebe za trajno pravno veljavo za doseganje pravic oseb (pravna varnost podjetja in zaposlenih) in izpolnjevanje zakonskih potreb. Vrednotenje je treba izvajati periodično in zajeti vse morebitne spremembe (spremembe v poslovnih procesih, sprememba zakonodaje, nadgradnja sistemov, organizacijske spremembe ...), ki vplivajo na poslovanje.

Proces vrednotenja se je v elektronskem okolju prestavil na začetek življenjskega cikla dokumenta, čeprav je to priporočljivo tudi za dokumente v papirni obliki. Z vrednotenjem poslovnih procesov za posamezno področje se določi, kateri zapisi oziroma digitalni dokumenti morajo pri tem nastati, hkrati pa se jim določi roke hrambe in mesto hranjenja. Ob kakršni koli spremembi znotraj pisarniškega poslovanja, poslovnih ali organizacijskih procesov priporoča ISO/TR 2018, da se izvede vrednotenje upravljanja dokumentov v štirih korakih. S tem se ohranja urejenost pisarniškega poslovanja in nadzor nad dokumenti, ki nastajajo ali so prejeti pri poslovanju pravne osebe.

Če drži, da se okrog 85 % arhiviranih dokumentov nikoli več ne uporabi, kot trdi Marinko (2013a, str. 94), je proces vrednotenja poslovne dokumentacije in upravljanja z zapisi izrednega pomena z vidika ekonomičnosti (zmanjševanje stroškov arhiviranja), dostopnosti informacij in dokumentov. Vrednotenje poslovne dokumentacije in poslovnih procesov ne sme biti začrtan okostenel proces, ampak vedno znova ponavljajoč se postopek, pri katerem se z analizo poslovnih postopkov, zakonskih zahtev in relevantnosti za poslovanje podjetja določi vrednost poslovne dokumentacije.

## SUMMARY

*Process of appraisal for business records is related to setting retention periods. However, process of appraisal for business records is much more than that. It is comprehensive overview of records management, business activities and identification of the legal framework that affects the execution of business activities. Process of appraisal for business records in relation to setting retention periods causes a number of problems in terms of organisation and implementation of this task.*

*ISO/TR 21946:2018: Information and documentation – Appraisal for managing records specifies the process of appraisal in four phases. In the first step all the information relevant to appraisal process are collected and analysed. After analysing and identifying the record requirements are they in the second phase linked to business functions, activities, operations and work process. The third phase of appraisal for managing records is to monitor results. In the final phase is to review the results of the control analysis. Whether implemented solutions are not effective a decision must be made to start a new appraisal process.*

*Despite the significant assertion of electronic and paperless records management, paper records are still created and kept in archives of various organisations and legal entities. Presented model of appraisal for managing records can also be used for appraising paper record. However, for effective appraisal for business records, appraisal criteria such as importance of the content (for business needs), need for permanent value for purpose of achieving legal interest (legal security of the organization and its employees) and legal needs, need to established.*

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*Typology: 1.02 Review article*

Gianni Penzo Doria<sup>1</sup>

## DATA DISPOSAL, RECORDS APPRAISAL

### Abstract

*In the continuous disciplinary battle between the archival science and the objective of data protection – a controversy nourished exclusively by those who persist in a reductive vision of records management – we are increasingly facing with decisions which will heavily affect a correct way in keeping and preserving the records produced both by public and private producers.*

*This paper aims to illustrate how a correct vision of archival science is not in conflict with data protection's goal, but rather should be considered to be an integral part of the records creator's point of view.*

*Keywords: Records Appraisal, Data Protection, Disposal, Data Protection Officer.*

## SCARTO DI DATI, SELEZIONE DI DOCUMENTI

### Sintesi

*Nella continua battaglia disciplinare tra archivistica e protezione dei dati personali, alimentata solo da chi persiste in una visione riduttiva della gestione documentale, si assiste – in modo sempre più frequente – a decisioni destinate a incidere pesantemente nella corretta conservazione dei documenti, sia di soggetti pubblici sia di soggetti privati.*

*L'intervento ha l'obiettivo di illustrare come l'archivistica non sia in contrasto con la protezione dei dati personali, ma deve integrarsi nel soggetto produttore come elemento essenziale*

*Parole chiave: Selezione, protezione dei dati personali, scarto, responsabile della protezione dei dati.*

## RAZPOLAGANJE S PODATKI, VREDNOTENJE GRADIVA

*V nenehnem boju med področji arhivistike in varovanja podatkov je prišlo do polemike, ki jo ohranjajo izključno tisti, ki vztrajajo pri reduktivni viziji upravljanja z dokumenti. Vse pogosteje se zato soočamo z odločitvami, ki bodo močno vplivale na pravilen način vodenja in ohranjanja zapisov, ki so jih izdelali tako javni kot zasebni producenti.*

*Namen tega prispevka je ponazoriti, kako pravilna vizija arhivistike ni v nasprotju s ciljem varstva podatkov, temveč bi morala biti obravnavana kot sestavni del stališča ustvarjalca dokumentov.*

*Ključne besede: vrednotenje, varstvo podatkov, izločevanje, pooblaščen oseba za varstvo podatkov.*

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## 1. UNA BATTAGLIA INTERDISCIPLINARE DA EVITARE PER IL BENE DEL SOGGETTO PRODUTTORE

Nella battaglia tra archivistica e protezione dei dati personali, alimentata negli ultimi tempi solo da chi persiste in una visione riduttiva della gestione documentale, si assiste – in modo sempre più frequente – a decisioni unilaterali, che esamineremo *infra*, destinate a incidere pesantemente nella conservazione legale dei documenti, tanto di soggetti pubblici quanto di soggetti privati.

Per tali ragioni, risulta necessario chiarire come l'archivistica non sia in contrasto con la protezione dei dati personali e che, di contro, debba necessariamente maturare l'idea di un'integrazione interdisciplinare a favore del soggetto produttore d'archivio. Si tratta, infatti, di un elemento essenziale della convivenza efficace di due obblighi normativi profondamente differenti e non confliggenti, che devono convivere in un equilibrio istituzionale.

Non a caso, uno dei cardini del GDPR è il rispetto del principio di proporzionalità, come introdotto dal *Considerando* 4: «Il diritto alla protezione dei dati di carattere personale non è una prerogativa assoluta, ma va considerato alla luce della sua funzione sociale e va temperato con altri diritti fondamentali, in ossequio al principio di proporzionalità»<sup>2</sup>.

In via preliminare, deve essere precisato che nella letteratura scientifica di settore non esiste una definizione generale di *dato* e di *informazione* in grado di attagliarsi trasversalmente alla protezione dei dati personali, alla scienza dell'informazione, all'archivistica e alla diplomatica.

A questo punto, prima di proseguire nella nostra indagine, risulta opportuno riesaminare le definizioni fondamentali per le nostre discipline, in alcuni casi adagate comodamente in terre di confine, tenendo comunque presente che a ogni definizione è sotteso, da un lato il rischio della caducità, dall'altro quello della settorialità, che porterebbe ad aumentare il rischio di accezioni ambigue.

Si tratta, infatti, di concetti cosiddetti "primitivi", i quali, in ragione della loro pervasività, non accolgono una serrata necessità definitoria, al pari del concetto di algoritmo (formalizzato per la prima volta da Turing con quella che oggi chiamiamo *macchina di Turing*) e di diversi concetti propri della geometria o delle scienze quantitative. Del resto, anche uno dei testi classici dell'informatica – sul quale si basano le definizioni mutuata da altre discipline – riprende le accezioni da un lessico generalista<sup>3</sup>.

## 2. DATO, INFORMAZIONE E DOCUMENTO

In linea generale, seguendo le indicazioni appena espresse, possiamo affermare che per *dato* si intende un fatto osservabile direttamente o un simbolo non interpretato; per *informazione* si intende un dato o un insieme di dati interpretati in un contesto determinato e significativo; per *conoscenza* si intende un insieme di informazioni organizzate e condivise in un contesto determinato e acquisite attraverso l'apprendimento e l'esperienza.

2 Regolamento (UE) 2016/679 del Parlamento europeo e del Consiglio, del 27 aprile 2016, relativo alla protezione delle persone fisiche con riguardo al trattamento dei dati personali, nonché alla libera circolazione di tali dati e che abroga la direttiva 95/46/CE (Regolamento generale sulla protezione dei dati - GDPR). Il testo, con un commento sulla trasparenza amministrativa, è stato integralmente pubblicato in questa rivista da (Monteduro 2016). Per una sintesi di raccordo con il Codice privacy, si veda il recente (D'Agostino et al., 2019).

3 Mi riferisco, in particolare, a (Atzeni et al., 2014 5a ed.; 2013). Ne approfitto per ringraziare tre colleghi, Marco Bernardo, Simona Bertè e Franco Cardin, per le preziose indicazioni. Sulla teoria dell'informazione, anche per gli aspetti metodologici, rinvio al fondamentale (Shannon, 1948; 1953). Sulla macchina di Turing, (Cappelli 2008).

Come vedremo tra poco, per parlare di *documento* abbiamo la necessità di introdurre un ulteriore requisito atto a identificarne una rappresentazione formale condivisa tra più domini di conoscenza, cioè l'ontologia in archivistica, in scienza dell'informazione e in protezione dei dati personali.

Nondimeno, per il nostro discorso, non ci può aiutare la manualistica sulla privacy, dal momento che persiste una cristallizzata endiadi di *dato personale* e non di *dato* singolarmente inteso o *tout court*, sulla quale si concentrano tutti i tentativi definitori, perlopiù mutuati dall'ordinamento vigente<sup>4</sup>.

Proviamo allora a definire con maggiore compiutezza dato, informazione e documento e, per quanto possibile, in una logica interdisciplinare.

Per *dato* si intende la più piccola unità significativa dell'informazione non ancora elaborata. Ad esempio un dato rappresentato sotto forma di numero potrebbe essere significativo della rappresentazione di una miriade di fatti o fenomeni che soltanto altri dati possono contestualizzare fino a diventare informazione. Infatti, preso singolarmente e in maniera asettica, il numero 301121 potrebbe essere il PIN di una carta di credito, un numero di protocollo oppure, come in questo caso, la data – 30 novembre 2021 – della seconda giornata della 31<sup>st</sup> Conference "International Archival Day" dell'International Institute for the archival science (Trieste/Italia – Maribor/Slovenia). Pertanto, per comprendere un dato e renderlo significativo, dobbiamo aggregarlo a un altro dato o ad altri dati in grado di determinarne il valore informativo. I dati sono, quindi, materie prime dell'informazione, ma prive di significato specifico, le quali, per ottenerne uno o più di uno, devono subire un'elaborazione<sup>5</sup>.

Più rischioso e generalista risulta il concetto di *informazione*, di fatto pervasivo in tutte le discipline umanistiche e nelle scienze dure. Con quel termine, infatti, si intende – in linea generale – un insieme di dati aggregati che possono essere comunicati nel tempo e nello spazio<sup>6</sup>.

Quando un dato si affianca a un altro dato per determinarne un significato si parla di *metadato* (dal greco "meta", con il significato di *sopra*, cioè di *dato sul dato*). Per esempio, se prendiamo il dato 301121 e lo affianchiamo a un dato descrittivo della seconda giornata della 31<sup>st</sup> Conference, potremmo ottenere una sequenza del genere:

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<date2_conference_IAS2021> 301121 <\date2_conference_IAS2021>
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Questi dati aggregati valorizzano una o più informazioni, ossia – nel caso in commento – il contenuto informativo riferito alla data della seconda giornata dello IAS 2021, la quale risulta esattamente il 30 novembre 2021 (Vivarelli, 2004).

Come conseguenza di quanto esposto finora, possiamo affermare che sussiste un'interdipendenza monodirezionale tra dato e informazione. Infatti, mentre l'informazione discende dai dati e dalla loro valorizzazione prodotta da altri dati anche indipendenti tra loro, i dati non dipendono in alcun modo dall'informazione.

Per *documento* – in senso generale e non archivistico – si intende una o più informazioni affisse stabilmente su un qualsiasi tipo di supporto. In altre parole, qualsiasi contenuto

4 Si vedano, ex multis, le pubblicazioni importanti e poderose come (AA.VV. 2019), fino al recentissimo (Codice della Privacy 2021).

5 «Data is an individual unit that contains raw materials which do not carry any specific meaning», così Cambridge International, AS & A Level Information Technology, <https://www.cambridgeinternational.org/images/285017-data-information-and-knowledge.pdf> (verificato il 21 novembre 2021).

6 Sull'ambiguità del concetto di informazione e per la copiosa rassegna bibliografica interdisciplinare, Riccardo Ridi, La piramide dell'informazione: una introduzione, <https://aibstudi.aib.it/article/view/11903/11481> (verificato il 21 novembre 2021).

informativo, se affisso in un supporto, può essere considerato un documento. Non a caso, nell'ambito ordinamentale europeo del digitale, come stabilito dal regolamento eIDAS, la definizione di documento elettronico è la seguente: «qualsiasi contenuto conservato in forma elettronica, in particolare testo o registrazione sonora, visiva o audiovisiva»<sup>7</sup>.

Per *documento archivistico*, inoltre, seguendo la definizione del vocabolario IIAS (*documento – unità informativa*) e del glossario di InterPares parzialmente rielaborato, si intende un documento prodotto da un soggetto come strumento e residuo della propria attività pratica<sup>8</sup>.

A questo punto, non possiamo tralasciare che, in ambito archivistico, la rappresentazione di un documento digitale non pertiene a una dimensione statica, ma a una soluzione pluridimensionale in cui diverse componenti – sotto forma di dati e di metadati – si aggregano in un susseguirsi di operazioni tecniche e di contesto (non soltanto di vincolo archivistico), che richiedono una grande preparazione professionale, a pena di perdita della memoria o di parti significative della memoria stessa, le quali – anche in minima parte – finirebbero con il compromettere uno degli elementi imprescindibili per l'ambito diplomatico: l'autenticità.

Infatti, la «rappresentazione di un documento non è altro che il risultato dell'aggregazione istantanea di componenti digitali distinte all'origine, come banalmente esemplificato da una qualunque pagina web; e sempre più spesso i sistemi documentari digitali sono purtroppo strutturati in maniera drammaticamente puntiforme, immergendo i documenti all'interno di depositi pressoché privi di organizzazione e dimenticando che gran parte del significato degli oggetti risiede proprio nelle relazioni cui partecipano, come risulta evidente – ad esempio – dal ruolo essenziale che l'organizzazione gerarchica di un archivio assume per la comprensione delle sue carte» (Michetti, 2008, pp. 33).

Un'ultima precisazione lessicale utile al nostro discorso è la definizione di *dato personale*. Seguendo l'ordinamento positivo e, nella fattispecie, ai sensi dell'art. 4 del *General Data Protection Regulation – GDPR*, per dato personale si intende «qualsiasi informazione riguardante una persona fisica identificata o identificabile («interessato»); si considera identificabile la persona fisica che può essere identificata, direttamente o indirettamente, con particolare riferimento a un identificativo come il nome, un numero di identificazione, dati relativi all'ubicazione, un identificativo online o a uno o più elementi caratteristici della sua identità fisica, fisiologica, genetica, psichica, economica, culturale o sociale».

In buona sostanza, un dato con l'aggiunta dell'aggettivo *personale* diventa informazione giuridicamente rilevante.

### 3. I DOCUMENTI PUBBLICI CONTENGONO IN RE IPSA DATI PERSONALI

A questo punto si impone un corollario importante per tutte le definizioni esposte finora. Le amministrazioni pubbliche trattano costantemente dati personali dei propri cittadini, degli utenti dei propri servizi e, ovviamente, dei titolari di poteri di firma, dei soggetti istruttori e dei responsabili dei procedimenti amministrativi e di tutto il personale interno.

7 Regolamento (UE) n. 910/2014 del Parlamento europeo e del Consiglio, del 23 luglio 2014, in materia di identificazione elettronica e servizi fiduciari per le transazioni elettroniche nel mercato interno e che abroga la direttiva 1999/93/CE: eIDAS è acronimo di electronic IDentification, Authentication and trust Services.

8 Il vocabolario multilingue dello IIAS si trova a seguente link <http://www.iias-trieste-maribor.eu/attivita-2/dizionario-plurilingue-2/dizionario/> (verificato il 21 novembre 2021) e quello di InterPares si trova già nei primi risultati di IP1, datato al dicembre 2001 al seguente link <http://interpares.org/>. Poi si veda (Duranti, 1997, pp. 15). La definizione proposta era di «documento prodotto o ricevuto da una persona fisica o giuridica come strumento e residuo della propria attività pratica». Per quanto attiene alla diplomatica, la definizione si trova in (Duranti, 1989).

Nella teoria generale del diritto amministrativo, infatti, uno dei casi di nullità più rilevanti è rappresentato dalla mancanza di un soggetto cui attribuire un atto amministrativo e, nel rispetto del diritto positivo, ogni documento pubblico uscito da una cancelleria pubblica deve contenere anche il nominativo del responsabile dell'istruttoria e, nella maggioranza dei casi, anche del destinatario di un provvedimento determinato.

Contestualizzato tutto ciò all'ambito diplomatico, possiamo affermare che *actor* e *scriptor* sono sempre presenti, così come la *mansio* risulta pressoché sempre presente. Infatti, anche nei documenti interni, ad es. verbali, deliberazioni, determinazioni, ordinanze, etc., compaiono sempre altri dati personali, riferiti ai partecipanti a una collegialità amministrativa, al destinatario di un provvedimento restrittivo e così via.

Da ciò consegue che, per perseguire finalità di pubblico interesse, nei documenti amministrativi prodotti dalle amministrazioni pubbliche è di fatto impossibile evitare il trattamento di dati personali con persistenza nel tempo.

Il problema – sempre ammesso, come vedremo, che di problema si tratti – è che i dati personali sono memorizzati all'interno di uno o più sistemi informatici, e, contemporaneamente, conservati in fondi differenti in quanto elementi di documenti amministrativi. Non a caso, memorizzazione di dati e conservazione di documenti rappresentano funzioni distinte per le amministrazioni pubbliche, ma perfettamente integrabili.

Facciamo qualche esempio. In un Comune i dati personali di un cittadino sono conservati nel database dello Stato civile, mentre i documenti inerenti al medesimo cittadino sono conservati nel fondo dello Stato civile, sia in fascicoli nominativi, sia nel Registro degli atti dello Stato civile. La carriera universitaria contenente anche i dati personali di uno studente – a volte anche cd. "sensibili", ad es. in caso di disabilità o di disturbi dell'apprendimento – è memorizzata nel sistema informatico gestionale, al pari dei dati inerenti agli esami sostenuti, mentre i documenti di riferimento, anche sotto forma di registro degli esami sostenuti o di certificazioni inerenti allo stato di salute, sono conservati come documenti amministrativi autonomi nel fascicolo di studente e nel fondo della Segreteria studenti o della Segreteria didattica<sup>9</sup>.

Anche sul fronte dell'albo on-line ci sono numerosi documenti contenenti dati personali soggetti ad anonimizzazione tramite la corruzione di una copia in autotutela. Sul punto, anche con finalità di pubblicità legale, è intervenuto tempestivamente il Garante per la protezione dei dati personali, proprio per definire i confini del trattamento da parte delle amministrazioni pubbliche<sup>10</sup>.

9 Il GDPR non utilizza il termine "sensibili", bensì "appartenenti a categorie particolari" (art. 9). L'endiadi dati sensibili era contenuta nelle definizioni del D.Lgs. 196/2003, art. 4, comma 1, lett. d): «dati personali idonei a rivelare l'origine razziale ed etnica, le convinzioni religiose, filosofiche o di altro genere, le opinioni politiche, l'adesione a partiti, sindacati, associazioni od organizzazioni a carattere religioso, filosofico, politico o sindacale, nonché i dati personali idonei a rivelare lo stato di salute e la vita sessuale». A margine, visto che l'argomento principale è racchiuso nel GDPR, è comunque opportuno rilevare che il D.Lgs. 196/2003 dedica tutto il Titolo VII al Trattamento ai fini di archiviazione nel pubblico interesse, di ricerca scientifica o storica o a fini statistici (artt. 97-110bis).

10 Garante per la protezione dei dati personali, Linee guida in materia di trattamento di dati personali contenuti anche in atti e documenti amministrativi, effettuato da soggetti pubblici per finalità di pubblicazione e diffusione sul web, Deliberazione 2 marzo 2011, n. 88. Sul punto, cfr. B. Montini, G. Penzo Doria, Albo on-line e privacy: commento alla Deliberazione del Garante 2 marzo 2011, n. 88, <https://www.filodiritto.com/albo-linee-e-privacy-commento-alla-deliberazione-del-garante-2-marzo-2011-n-88> (verificato il 21 novembre 2021). A seguito dell'emanazione del D.Lgs. 33/2013 (per il quale v. infra nota 22), sono state sostituite dal Garante per la protezione dei dati personali con deliberazione 15 maggio 2014, n. 243, Linee guida in materia di trattamento di dati personali, contenuti anche in atti e documenti amministrativi, effettuato per finalità di pubblicità e trasparenza sul web da soggetti pubblici e da altri enti obbligati.



Come abbiamo potuto evidenziare, dunque, per le amministrazioni pubbliche il trattamento dei dati personali è pervasivo e non risparmia di fatto alcun documento amministrativo.

#### 4. DATA RETENTION E RECORDS RETENTION

Orbene, uno dei pilastri fondanti dell'ordinamento giuridico sulla protezione dei dati personali è il tempo di conservazione (*Data retention*), come definito dall'art. 5, paragrafo 1, lett. e) del GDPR in merito ai principi applicabili al trattamento di dati personali. Tali dati, infatti, devono essere conservati «in una forma che consenta l'identificazione degli interessati per un arco di tempo non superiore al conseguimento delle finalità per le quali sono trattati; i dati personali possono essere conservati per periodi più lunghi a condizione che siano trattati esclusivamente a fini di archiviazione nel pubblico interesse, di ricerca scientifica o storica o a fini statistici, conformemente all'articolo 89, paragrafo 1, fatta salva l'attuazione di misure tecniche e organizzative adeguate richieste dal presente regolamento a tutela dei diritti e delle libertà dell'interessato («limitazione della conservazione»)».

Anche gli archivi non sono soggetti a conservazione indeterminata e, in perfetta simmetria, esiste il concetto di tempo di conservazione dei documenti (*Records retention*). Esso è orientato non soltanto alle finalità inerenti all'utilizzo, ma anche al valore storico che gli archivi possiedono fin dall'origine, cioè all'atto della produzione.

I tempi di conservazione, infatti, sono descritti in strumenti altamente professionali chiamati Massimari di selezione (o Piani di conservazione – *Retention plans*) e rispondono a logiche rivolte non soltanto – come nel caso dei dati personali – alla tutela dell'individuo, ma anche alla conservazione della memoria di un soggetto produttore come funzione sociale per la collettività.

Il titolo di questo saggio, in aderenza al lessico tecnico di protezione dei dati personali e di archivistica, avrebbe potuto essere *Cancellazione di dati, selezione di documenti (Data erasure, Records appraisal)*. Per mantenere un lessico archivistico omogeneo, invece, si è preferito quello di *Scarto di dati, selezione di documenti (Data disposal, Records appraisal)*.

Il GDPR, infatti, non conosce il termine *scarto (disposal)*, ma esclusivamente *cancellazione (erasure)*. Sono invece quasi irrilevanti per il nostro discorso altri termini del GDPR, come *distruzione (destruction)* o *danno (damage)*. Anzi, per simmetria con le disposizioni del GDPR, la cancellazione di dati è concettualmente assimilabile al *diritto all'oblio* o, per rimanere alla traduzione letterale, *diritto di essere dimenticati (Right to be forgotten)*, che esamineremo a breve proprio per tentare di equilibrare due esigenze apparentemente opposte: la cancellazione di dati e la conservazione di documenti.

Tuttavia, già nell'art. 5 del GDPR richiamato *supra*, è inserita anche la soluzione per la conservazione di dati sotto forma di documenti per necessità delle amministrazioni pubbliche, con un richiamo al successivo art. 89 sulle finalità di archiviazione nel pubblico interesse, di ricerca scientifica o storica o a fini statistici.

Invece, assistiamo sempre più frequentemente a posizioni intransigenti e verticali da parte del Responsabile della protezione dei dati personali (*Data Protection Officer – DPO*), il quale ordina la distruzione di documenti contenenti dati personali non appena spirato il termine inerente alle finalità del trattamento. In questo caso, il passaggio all'ordine di distruzione di tutti i documenti che contengono dati personali, per azzerare il rischio di conservarli oltre il termine, è spesso breve.

Prima di proporre una soluzione possibile, vediamo di chiarire i contorni della figura del DPO, come introdotta nell'ordinamento europeo dall'art. 37 del GDPR. Il professionista dei dati, innanzitutto, deve assolvere ai compiti previsti dal successivo art. 39. In parti-

colare, si tratta di un ruolo strategico di consulenza trasversale, di analisi e di sorveglianza sull'applicazione della normativa vigente in materia<sup>11</sup>.

Trasversale, dicevamo. Uno dei problemi più evidenti è che in alcune amministrazioni pubbliche operano DPO privi di preparazione archivistica, a volte claudicanti nel diritto e spogliati di quel bagaglio imprescindibile di conoscenza tecniche (e non tecnologiche) atto a sistematizzare e a contestualizzare l'applicazione della protezione dei dati personali ai documenti pubblici. In larga misura sono operatori di informatica, non scienziati dell'informazione.

Quando il ruolo di DPO è ricoperto da una figura del genere, poco avveza all'analisi di sistemi e alla *cybersecurity*, ma dedito a operazioni più consone all'informatica individuale, il quadro è completo<sup>12</sup>.

Per quanto riguarda la conservazione dei documenti archivistici che – pressoché inevitabilmente – contengono dati personali, il legislatore europeo ha introdotto due *Considerandi*. In particolare, il C50 dispone che: «Se il trattamento è necessario per l'esecuzione di un compito di interesse pubblico o per l'esercizio di pubblici poteri di cui è investito il titolare del trattamento, il diritto dell'Unione o degli Stati membri può stabilire e precisare le finalità e i compiti per i quali l'ulteriore trattamento è considerato lecito e compatibile. L'ulteriore trattamento a fini di archiviazione nel pubblico interesse, o di ricerca scientifica o storica o a fini statistici dovrebbe essere considerato un trattamento lecito e compatibile»<sup>13</sup>.

Un altro *Considerando* molto importante è il C158, anche per gli aspetti sociali e di evidenza probatoria contro la *post-verità* e verso un'educazione civica archivistica e digitale. Ecco, dunque, il dettato normativo europeo del C158: «Qualora i dati personali siano trattati a fini di archiviazione, il presente regolamento dovrebbe applicarsi anche a tale tipo di trattamento, tenendo presente che non dovrebbe applicarsi ai dati delle persone decedute. Le autorità pubbliche o gli organismi pubblici o privati che tengono registri [traduzione corretta: documenti archivistici] di interesse pubblico dovrebbero essere servizi che, in virtù del diritto dell'Unione o degli Stati membri, hanno l'obbligo legale di acquisire, conservare, valutare, organizzare, descrivere, comunicare, promuovere, diffondere e fornire accesso a registri [traduzione corretta: documenti archivistici]

11 GDPR, art. 39: «a) informare e fornire consulenza al titolare del trattamento o al responsabile del trattamento nonché ai dipendenti che eseguono il trattamento in merito agli obblighi derivanti dal presente regolamento nonché da altre disposizioni dell'Unione o degli Stati membri relative alla protezione dei dati; b) sorvegliare l'osservanza del presente regolamento, di altre disposizioni dell'Unione o degli Stati membri relative alla protezione dei dati nonché delle politiche del titolare del trattamento o del responsabile del trattamento in materia di protezione dei dati personali, compresi l'attribuzione delle responsabilità, la sensibilizzazione e la formazione del personale che partecipa ai trattamenti e alle connesse attività di controllo; c) fornire, se richiesto, un parere in merito alla valutazione d'impatto sulla protezione dei dati e sorvegliarne lo svolgimento ai sensi dell'articolo 35; d) cooperare con l'autorità di controllo; e e) fungere da punto di contatto per l'autorità di controllo per questioni connesse al trattamento, tra cui la consultazione preventiva di cui all'articolo 36, ed effettuare, se del caso, consultazioni relativamente a qualunque altra questione».

12 Sul punto, non sorprenda la questione, dal momento che – semplicemente a scorrere i bandi pubblici per la manifestazione di interesse a ricoprire il ruolo di DPO – l'offerta economica si aggira intorno ai 2-3.000 euro lordi, compenso del tutto inadeguato per un professionista dei dati, probabilmente più consono a una figura avveza alle operazioni pratiche sugli applicativi più diffusi. E la protezione dei dati personali sarà esponenzialmente sempre più legata alla sicurezza informatica, al punto da poter individuare una figura di *privacy/cybersecurity officer*.

13 GDPR, C50: «If the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, Union or Member State law may determine and specify the tasks and purposes for which the further processing should be regarded as compatible and lawful. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes should be considered to be compatible lawful processing operations».

tici] con un valore a lungo termine per l'interesse pubblico generale. Gli Stati membri dovrebbero inoltre essere autorizzati a prevedere il trattamento ulteriore dei dati personali per finalità di archiviazione, per esempio al fine di fornire specifiche informazioni connesse al comportamento politico sotto precedenti regimi statali totalitari, a genocidi, crimini contro l'umanità, in particolare l'Olocausto, o crimini di guerra».

In poche parole, per finalità archivistiche – che il legislatore enuclea come pubblico interesse, ricerca scientifica, storica o statistica – il trattamento è lecito e compatibile, laddove per *trattamento* si intende anche la conservazione di documenti archivistici. Infatti, l'art. 4, punto 2, del GDPR intende per trattamento «qualsiasi operazione o insieme di operazioni, compiute con o senza l'ausilio di processi automatizzati e applicate a dati personali o insiemi di dati personali, come la raccolta, la registrazione, l'organizzazione, la strutturazione, la conservazione, l'adattamento o la modifica, l'estrazione, la consultazione, l'uso, la comunicazione mediante trasmissione, diffusione o qualsiasi altra forma di messa a disposizione, il raffronto o l'interconnessione, la limitazione, la cancellazione o la distruzione»<sup>14</sup>.

Non bastasse, il legislatore europeo ha ribadito il concetto anche nel C65, secondo capoverso: «Tuttavia, dovrebbe essere lecita l'ulteriore conservazione dei dati personali qualora sia necessaria per esercitare il diritto alla libertà di espressione e di informazione, per adempiere un obbligo legale, per eseguire un compito di interesse pubblico o nell'esercizio di pubblici poteri di cui è investito il titolare del trattamento, per motivi di interesse pubblico nel settore della sanità pubblica, a fini di archiviazione nel pubblico interesse, di ricerca scientifica o storica o a fini statistici, ovvero per accertare, esercitare o difendere un diritto in sede giudiziaria»<sup>15</sup>.

## 5. DUE CASI CONCRETI

Da quanto finora illustrato, dovrebbe essere evidente, anche al più impreparato dei DPO, che la conservazione dei documenti archivistici risponde ai criteri di selezione documentale e non di cancellazione di dati personali.

Per queste ragioni è inaccettabile trovare nelle amministrazioni pubbliche un ordine di servizio come il seguente (qui anonimizzato): «Al fine di prevenire il più possibile accessi abusivi alle informazioni contenenti dati personali, soprattutto in presenza di dati c.d. particolari (come quelli relativi allo stato di salute dei cittadini con disabilità), sono state predisposte le seguenti istruzioni operative per la distruzione dei documenti cartacei. Tale procedura di smaltimento prevede, in particolare, l'utilizzo di distruggi-documenti prima che questi ultimi vengano cestinati».

Al di là del lessico incerto e delle omissioni riguardo alle autorizzazioni necessarie, giova ribadire che le procedure di scarto, cioè di eliminazione legale di documenti, rispondono all'art. 21, comma 1, lett. d) del D.Lgs. 42/2004 e necessitano di autorizzazione preventiva da parte del Ministero della Cultura. Tale autorizzazione è rilasciata attra-

14 GDPR, art. 4: «'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction». Qui, rispetto all'ordinamento italiano previgente (675/1996) si evidenzia l'opportuna precisazione che il concetto di trattamento si applica anche ai dati non presenti in database.

15 GDPR, C65: «However, the further retention of the personal data should be lawful where it is necessary, for exercising the right of freedom of expression and information, for compliance with a legal obligation, for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, on the grounds of public interest in the area of public health, for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, or for the establishment, exercise or defence of legal claims».

verso la Soprintendenza archivistica e bibliografica competente per territorio per gli archivi degli enti pubblici e quelli privati dichiarati di interesse culturale e attraverso la Commissione di sorveglianza per gli archivi statali<sup>16</sup>.

Un secondo caso è stato oggetto di discussione in un gruppo di lavoro interprofessionale universitario. La richiesta del laureato, inviata attraverso la posta elettronica priva di identificazione, era la seguente: «Chiedo la cancellazione dei miei dati personali da tutte le banche dati, archivi e registri dell'università fatta eccezione per quelli contenuti in atti che devono essere obbligatoriamente conservati». Due operatori di informatica rispondono prospettando due casi, con la seconda risposta davvero imbarazzante:

- a) il fascicolo di studente è gestito interamente in digitale e inviato in conservazione, questo potrebbe giustificare la cancellazione completa di tutti i dati dal database del gestionale carriere studenti mantenendo solo il fascicolo;
- b) il fascicolo elettronico è da sempre incompleto e non è mai stato inviato in conservazione, i dati di carriera sono nel gestionale, ovviamente non si possono cancellare, a meno di non copiare tutto sui documenti nel fascicolo di studente.

Inoltre, in alcune circostanze i DPO agitano le sanzioni previste dal GDPR, che li spingono a fare pressioni sul titolare del trattamento. Ai DPO, oltre alle sanzioni previste dal D.Lgs. 42/2004, giova ricordare che, oltre alle sanzioni previste dal D.Lgs. 42/2004, l'art. 490 del Codice penale, come modificato dal D.Lgs. 7/2016, sulla distruzione dei documenti archivistici dispone quanto segue: «Chiunque, in tutto o in parte, distrugge, sopprime od occulta un atto pubblico vero o, al fine di recare a sé o ad altri un vantaggio o di recare ad altri un danno, distrugge, sopprime od occulta un testamento olografo, una cambiale o un altro titolo di credito trasmissibile per girata o al portatore veri, soggiace rispettivamente alle pene stabilite negli articoli 476, 477 e 482, secondo le distinzioni in essi contenute». Non si scherza, dunque, con le sanzioni previste per la distruzione di documenti pubblici, con pene che variano da uno a dieci anni<sup>17</sup>.

Del resto, la normativa di settore sugli archivi aveva con chiarezza messo dei limiti invalicabili all'impulso sfrenato di distruggere avalutativamente i dati contenuti in documenti archivistici. Infatti, lo stesso D.Lgs. 42/2004, all'art. 126, comma 3, aveva chiaramente stabilito che «La consultazione per scopi storici dei documenti contenenti dati personali è assoggettata anche alle disposizioni del codice di deontologia e di buona condotta previsto dalla normativa in materia di trattamento dei dati personali».

Tale previsione – e qui non è ammessa alcuna ignoranza da parte dei DPO operatori di informatica – oggi trova la sua applicazione più concreta nelle regole deontologiche approvate tanto dal Garante privacy quanto, più recentemente, dal Ministero della giustizia<sup>18</sup>.

16 D.Lgs. 22 gennaio 2004, n. 42, Codice dei beni culturali e del paesaggio, ai sensi dell'articolo 10 della legge 6 luglio 2002, n. 137, con particolare riferimento all'art. 21, comma 1, lett. d), sono subordinati all'autorizzazione del Ministero: «lo scarto dei documenti degli archivi pubblici e degli archivi privati per i quali sia intervenuta la dichiarazione ai sensi dell'articolo 13, nonché lo scarto di materiale bibliografico delle biblioteche pubbliche, con l'eccezione prevista all'articolo 10, comma 2, lettera c), e delle biblioteche private per le quali sia intervenuta la dichiarazione ai sensi dell'articolo 13». Per gli archivi statali, le Commissioni di sorveglianza sono tuttora regolate dal DPR 8 gennaio 2001, n. 37, Regolamento di semplificazione dei procedimenti di costituzione e rinnovo delle Commissioni di sorveglianza sugli archivi e per lo scarto dei documenti degli uffici dello Stato (n. 42, allegato 1, della legge n. 50/1999).

17 Limpidamente, ne aveva trattato più di sessant'anni fa (Olla Repetto, 1960).

18 Garante per la protezione dei dati, Deliberazione 19 dicembre 2018, n. 513, Regole deontologiche per il trattamento a fini di archiviazione nel pubblico interesse o per scopi di ricerca storica pubblicate ai sensi dell'art. 20, comma 4, del D.Lgs. 10 agosto 2018, n. 101 e Ministero della giustizia, Decreto, 15 marzo 2019, Inserimento nell'allegato A del decreto legislativo 30 giugno 2003, n. 196, delle regole deontologiche per il trattamento a fini di archiviazione nel pubblico interesse o per scopi di ricerca storica.

Per chiudere il cerchio su questo discorso, rimane soltanto da ricordare che stanno sviluppandosi nuovi mestieri di intermediari dei dati – detti anche *Data Broker* – con il compito di aiutare cittadini e imprese a destreggiarsi tra i dati legittimamente trattati dalle amministrazioni pubbliche. Il fenomeno – distinto da quello dei *Data Reseller*, veri e propri cacciatori di dati – è attualmente all'attenzione del Garante per la protezione dei dati personali.

## 6. UN PONTE VERSO I DPO: IL GRUPPO ARCHIVI EUROPEO

Uno dei documenti più importanti pensato e redatto per coniugare le esigenze di archivistica e di protezione dei dati personali è rappresentato dalle *Linee guida sull'applicazione del Regolamento europeo di protezione dati personali negli archivi*, elaborate dal Gruppo Archivi Europei (*European Archives Group* – EAG)<sup>19</sup>.

Il documento rappresenta una sorta di vademecum pensato appositamente per gli archivisti nell'applicazione di una norma con sanzioni assai severe, sia in ambito amministrativo sia in ambito penale, cercando correttamente di destrutturare ogni paura. Del resto, lo EAG è un gruppo ufficiale di esperti della Commissione europea, istituito agli inizi del 2006 e formato da rappresentanti degli archivi nazionali dei paesi membri dell'UE, che ha seguito la genesi del GDPR dal 2012 al 2016.

Gli archivisti, infatti, non sono votati alla conservazione passiva, né indiscriminata, né a oltranza. Anzi, una delle funzioni più delicate della funzione archivistica è proprio la selezione, mediante valutazione, della necessità di conservazione di documenti determinati. Proprio a questo servono i massimari di selezione (*Retention plans*)<sup>20</sup>.

Per tali ragioni, il documento di EAG, richiamando l'aderenza all'art. 25 del GDPR della conservazione dei documenti archivistici, afferma con forza le attività di presidio che i servizi archivistici devono porre in essere: «Archive services adopt an appraisal policy that limits the permanent preservation of records containing personal data to what is really necessary, according to their mission. They put into practice Article 25 by carefully drafting retention plans that define which kind of files containing personal data have to be selected for permanent preservation. For archive services, retention plans are tools to demonstrate compliance with Article 25» (pp. 23).

Infine, a mettere una pietra tombale sulle ingerenze inappropriate dei DPO sulla conservazione dei documenti archivistici interviene l'art. 89 del GDPR, con linearità cristallina:

### art. 89

Garanzie e deroghe relative al trattamento a fini di archiviazione nel pubblico interesse, di ricerca scientifica o storica o a fini statistici

1. Il trattamento a fini di archiviazione nel pubblico interesse, di ricerca scientifica o storica o a fini statistici è soggetto a garanzie adeguate per i diritti e le libertà dell'interessato, in conformità del presente regolamento. Tali garanzie assicurano che siano state predisposte misure tecniche e organizzative, in particolare al fine di garantire il rispetto del principio della minimizzazione dei dati. Tali misure possono includere la pseudoanonimizzazione, purché le finalità in questione possano essere conseguite in tal modo. Qualora possano

19 La notizia è stata data opportunamente dalla referente italiana, Giulia Barrera, su «Il Mondo degli Archivi», 29 ottobre 2018: <http://www.ilmondodegliarchivi.org/rubriche/in-italia/685-protezione-dati-personali-negli-archivi-pubblicate-le-linee-guida-dello-european-archives-group-sull-applicazione-del-regolamento-europeo-protezione-dati-personali-gdpr>. La pagina di riferimento istituzionale dell'EAG è la seguente: [https://ec.europa.eu/info/about-european-commission/service-standards-and-principles/transparency/freedom-information/access-documents/information-and-document-management/archival-policy/european-archives-group\\_en](https://ec.europa.eu/info/about-european-commission/service-standards-and-principles/transparency/freedom-information/access-documents/information-and-document-management/archival-policy/european-archives-group_en).

20 Sul tema resta ancora valido, per gli aspetti generali e metodologici, (Duranti, 1994), mentre è doveroso citare lo studio antesignano di (Naugler, 1983) e il commento di (Cox, 1990).

essere conseguite attraverso il trattamento ulteriore che non consenta o non consenta più di identificare l'interessato, tali finalità devono essere conseguite in tal modo.

2. Se i dati personali sono trattati a fini di ricerca scientifica o storica o a fini statistici, il diritto dell'Unione o degli Stati membri può prevedere deroghe ai diritti di cui agli articoli 15, 16, 18 e 21, fatte salve le condizioni e le garanzie di cui al paragrafo 1 del presente articolo, nella misura in cui tali diritti rischiano di rendere impossibile o di pregiudicare gravemente il conseguimento delle finalità specifiche e tali deroghe sono necessarie al conseguimento di dette finalità

3. Se i dati personali sono trattati per finalità di archiviazione nel pubblico interesse, il diritto dell'Unione o degli Stati membri può prevedere deroghe ai diritti di cui agli articoli 15, 16, 18, 19, 20 e 21, fatte salve le condizioni e le garanzie di cui al paragrafo 1 del presente articolo, nella misura in cui tali diritti rischiano di rendere impossibile o di pregiudicare gravemente il conseguimento delle finalità specifiche e tali deroghe sono necessarie al conseguimento di dette finalità.

4. Qualora il trattamento di cui ai paragrafi 2 e 3 funga allo stesso tempo a un altro scopo, le deroghe si applicano solo al trattamento per le finalità di cui ai medesimi paragrafi.

Anche l'EAG interviene con chiarezza distinguendo tra il tempo di conservazione di dati e il tempo di conservazione di documenti. Ecco la traduzione di un passaggio importante (il sottolineato è presente nell'originale): «**Attenzione:** Dal punto di vista dei servizi archivistici, è di particolare importanza far presente ai soggetti produttori che il "tempo di conservazione" non deve essere confuso con lo "smaltimento" delle informazioni e che dovrebbero agire in conformità con la legge sugli archivi e secondo quanto previsto dai massimari di scarto. I dati archiviati nell'interesse pubblico, infatti, non devono mai essere distrutti»<sup>21</sup>.

In altre parole, non essendo il diritto alla protezione dei dati personali assoluto, una compressione limitata di quel diritto per finalità di pubblico interesse e di sicurezza pubblica è ampiamente giustificata, prima di tutto dal buon senso e, in seconda battuta, dalle norme positive.

## 7. IL DIRITTO DI ACCESSO E LA PROTEZIONE DEI DATI PERSONALI

In caso di opposizione di un controinteressato all'esercizio del diritto di accesso da parte di terzi, non è possibile esporre la condizione o la preoccupazione che un documento determinato contenga dati personali del controinteressato medesimo. Infatti, proprio in ossequio a quanto previsto dall'ordinamento vigente, le norme di riferimento restano la legge 241/1990 per l'accesso documentale e il D.Lgs. 33/2013 per l'accesso civico<sup>22</sup>.

Su questo tema specifico il Codice privacy è lapidario<sup>23</sup>.

21. Testo originale: «**Attention:** From the point of view of archive services, it is of particular importance to point out to archives' creators that 'retention period' must not be confused with 'disposal' of information, and that they should act in conformity with the Law on Archives and as stipulated in the archival disposal schedules. Data archived in the public interest must indeed never be destroyed».

22. Legge 7 agosto 1990, n. 241, Nuove norme in materia di procedimento amministrativo e di diritto di accesso ai documenti amministrativi e D.Lgs. 14 marzo 2013, n. 33, Riordino della disciplina riguardante il diritto di accesso civico e gli obblighi di pubblicità, trasparenza e diffusione di informazioni da parte delle pubbliche amministrazioni.

23. D.Lgs. 30 giugno 2003, n. 196, Codice in materia di protezione dei dati personali, recante disposizioni per l'adeguamento dell'ordinamento nazionale al regolamento (UE) n. 2016/679 del Parlamento europeo e del Consiglio, del 27 aprile 2016, relativo alla protezione delle persone fisiche con riguardo al trattamento dei dati personali, nonché alla libera circolazione di tali dati e che abroga la direttiva 95/46/CE. Il titolo è stato così modificato dall'art. 1, comma 1, D.Lgs. 10 agosto 2018, n. 101. Il titolo originario, meno esteso, era infatti Codice in materia di protezione dei dati personali.

Infatti, all'art. 59 (Accesso a documenti amministrativi e accesso civico), il D.Lgs. 196/2003, ordina che: «1. Fatto salvo quanto previsto dall'articolo 60, i presupposti, le modalità, i limiti per l'esercizio del diritto di accesso a documenti amministrativi contenenti dati personali, e la relativa tutela giurisdizionale, restano disciplinati dalla legge 7 agosto 1990, n. 241, e successive modificazioni e dalle altre disposizioni di legge in materia, nonché dai relativi regolamenti di attuazione, anche per ciò che concerne i tipi di dati di cui agli articoli 9 e 10 del regolamento e le operazioni di trattamento eseguibili in esecuzione di una richiesta di accesso.

1-bis. I presupposti, le modalità e i limiti per l'esercizio del diritto di accesso civico restano disciplinati dal decreto legislativo 14 marzo 2013, n. 33».

## 8. CONCLUSIONI

La selezione dei documenti contenenti (anche) dati personali risponde alle procedure e alle norme archivistiche e, più in generale, a quelle sull'attività amministrativa. Anche l'esercizio del diritto di accesso a documenti contenenti dati personali sfugge correttamente alla sfera di competenza del GDPR e rimane in capo all'ordinamento in materia di diritto di accesso e, più in generale, di trasparenza amministrativa.

A questo punto, risulta necessario rafforzare la consapevolezza del ruolo degli archivi nelle amministrazioni pubbliche e nelle aziende private, in una visione non subalterna rispetto alla protezione dei dati personali. In particolare, è necessario rendere partecipi i DPO del valore degli archivi pubblici senza ambiguità o subordine rispetto alla privacy e che, sul punto, la gestione documentale deve necessariamente intersecarsi con la protezione dei dati personali in una visione interdisciplinare.

Al riguardo, le recenti Linee guida AgID sul documento informatico, tra i principi generali della gestione documentale descritti al § 1.11, dispongono che «il sistema di gestione informatico dei documenti, la cui tenuta può anche essere delegata a terzi, affinché possa essere efficiente e sicuro deve essere necessariamente presidiato da specifiche procedure e strumenti informatici, in grado di governare con efficacia ogni singolo accadimento che coinvolge la vita del documento ed effettuata secondo i principi generali applicabili in materia di trattamento dei dati personali anche mediante un'adeguata analisi del rischio»<sup>24</sup>.

In quest'ambito archivistico e digitale, la protezione dei dati personali è citata più volte, con contezza sia per gli aspetti conservativi, sia per gli aspetti di sicurezza informatica, spesso unitamente al Responsabile della transizione digitale, altra figura imprescindibile per l'amministrazione pubblica italiana. Ciò testimonia la necessità di agire trasversalmente sul fronte di una funzione delicatissima inerente alla tutela di un bene della vita come sono gli archivi pubblici<sup>25</sup>.

24 Agenzia per l'Italia digitale, Determinazione del Direttore Generale 17 maggio 2021, n. 371, Linee guida sulla formazione, gestione e conservazione dei documenti informatici, con la quale è stata modificata e integrata la precedente determinazione 9 settembre 2020, n. 407 ed è stata differita l'entrata in vigore dal 7 giugno 2021 al 1° gennaio 2022.

25 Le Linee guida trattano la protezione dei dati personali, ad. es., ai §§ 2.1.1, 3.1.6, 3.4, 3.5, 3.9, 4.1, 4.5, 4.9, 4.10, 4.11. Sulla funzione cruciale dell'archivio anche di bene immateriale, cfr. (Penzo Doria 2008).

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## THE PROBLEM OF APPRAISAL OF DIGITAL RECORDS

### Abstract

**Purpose:** Modern information technology has revolutionized the types of documents and their content over the past two decades. The vast part of the information is occurred and stored in electronic form as part of the various information systems. Electronic documents, including databases, have become an important means of securing, storing and exchanging information, the volume of which is increasing significantly every year. In this regard, the issue of not only ensuring their preservation, but also determining the principles, methods and criteria for the selection of electronic documents to be included in the National Archives Fund, acquires particular importance. This study focuses on a comprehensive, systematic consideration of the theoretical and practical aspects of organizing and conducting an examination of the value of digital documents in order to identify existing problems and search for possible solutions.

**Methods / Approach:** The research is based on analysis of the national legislation of Kazakhstan and empirical data, the study of literature and study the domestic and foreign authors. The research used informational and systemic methods, the method of structural analysis, etc.

**Results:** The author considers the definition of the value of documents as an indispensable condition and basis for the organization of any archive, including an archive of electronic documents. Based on the experience of introducing the information system "Single archive of electronic documents" in the archives of Kazakhstan, the possibility of applying the methodology and practice of examining the value of paper archival documents to electronic documents is being considered. Assesses basic selection problems of electronic documents for permanent preservation and suggests possible solutions.

**Conclusions / Findings:** On the basis of the research conducted, the author concludes that the methodology for assessing the value of electronic documents should be based on the practical experience of working with archives with electronic documents. Traditional approaches to the examination of value undoubtedly need to be adjusted and developed based on the features of the properties and technical characteristics of electronic documents, which ensure the possibility of their further use.

**Keywords:** digital records, appraisal of digital records, digital archive, authenticity of rerecords, long-term preservation

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## IL PROBLEMA DELLA VALUTAZIONE DEI DOCUMENTI DIGITALI

### SINTESI

**Scopo:** *la moderna tecnologia dell'informazione ha rivoluzionato i tipi di documenti e il loro contenuto negli ultimi due decenni. La maggior parte delle informazioni è avvenuta e conservata in forma elettronica nell'ambito dei vari sistemi informativi. I documenti elettronici, comprese le banche dati, sono diventati un mezzo importante per proteggere, archiviare e scambiare informazioni, il cui volume aumenta notevolmente ogni anno. A questo proposito, acquista particolare importanza la questione non solo di assicurarne la conservazione, ma anche di determinare i principi, le modalità e i criteri per la selezione dei documenti elettronici da inserire nel Fondo archivistico nazionale. Questo studio si concentra su una considerazione completa e sistematica degli aspetti teorici e pratici dell'organizzazione e della conduzione di un esame del valore dei documenti digitali al fine di identificare i problemi esistenti e cercare possibili soluzioni.*

**Metodi / Approccio:** *La ricerca si basa sull'analisi della legislazione nazionale del Kazakistan e i dati empirici, lo studio della letteratura e lo studio degli autori nazionali e stranieri. La ricerca ha utilizzato metodi informativi e sistemici, il metodo dell'analisi strutturale, ecc.*

**Risultati:** *L'autore considera la definizione del valore dei documenti come condizione e base indispensabile per l'organizzazione di qualsiasi archivio, compreso un archivio di documenti elettronici. Sulla base dell'esperienza di introduzione del sistema informativo "Archivio unico di documenti elettronici" negli archivi del Kazakistan, si sta valutando la possibilità di applicare la metodologia e la pratica di esame del valore dei documenti d'archivio cartacei ai documenti elettronici. Valuta i problemi di selezione di base dei documenti elettronici per la conservazione permanente e suggerisce possibili soluzioni.*

**Conclusioni/Risultati:** *Sulla base della ricerca condotta, l'autore conclude che la metodologia per valutare il valore dei documenti elettronici dovrebbe basarsi sull'esperienza pratica di lavoro con archivi con documenti elettronici. Gli approcci tradizionali all'esame del valore devono indubbiamente essere adeguati e sviluppati sulla base delle caratteristiche delle proprietà e delle caratteristiche tecniche dei documenti elettronici, che ne assicurano la possibilità di un ulteriore utilizzo.*

**Parole chiave:** *archivi digitali, perizie di archivi digitali, archivio digitale, autenticità delle registrazioni, conservazione a lungo termine*

## PROBLEMATIKA VREDNOTENJA DIGITALNIH ZAPISOV

### **Povzetek**

**Namen:** *Sodobna informacijska tehnologija je v zadnjih dveh desetletjih spremenila vrste dokumentov in njihovo vsebino. Velik del informacij je nastal in je shranjen v elektronski obliki kot del različnih informacijskih sistemov. Elektronski dokumenti, vključno z bazami podatkov, so postali pomembno sredstvo za varovanje, shranjevanje in izmenjavo informacij, katerih obseg se vsako leto močno povečuje. V zvezi s tem je še posebej pomembno vprašanje ne le zagotavljanja njihove hrambe, temveč tudi določitev načel, načinov in meril za izbor elektronskih dokumentov za vključitev v Državni arhivski sklad. Ta študija se osredotoča na celovito, sistematično preučitev teoretičnih in praktičnih vidikov organiziranja in izvajanja presoje vrednosti digitalnih dokumentov z namenom prepoznavanja obstoječih problemov in iskanja možnih rešitev.*

**Metode / pristopi:** *Raziskava temelji na analizi nacionalne zakonodaje Kazahstana in empiričnih podatkov, preučevanju literature in študij domačih in tujih avtorjev. Pri raziskavi so bile uporabljene informacijske in sistemske metode, metoda strukturne analize, ipd.*

**Rezultati:** *Opredelitev vrednosti dokumentov avtor obravnava kot nepogrešljiv pogoj in podlago za organizacijo vsakega arhiva, vključno z arhivom elektronskih dokumentov. Na podlagi izkušenj z uvedbo informacijskega sistema „Enotni arhiv elektronskih dokumentov“ v arhivih Kazahstana se proučuje možnost uporabe metodologije in prakse preverjanja vrednosti papirnih arhivskih dokumentov vse do elektronskih dokumentov. Prispevek tudi oceni osnovne probleme izbire elektronskih dokumentov za trajno hrambo in predlaga možne rešitve.*

**Zaključki / ugotovitve:** *Na podlagi opravljene raziskave avtor ugotavlja, da bi morala metodologija vrednotenja elektronskih dokumentov temeljiti na praktičnih izkušnjah dela z arhivi z elektronskimi dokumenti. Tradicionalne pristope k presoji vrednosti je nedvomno treba prilagajati in razvijati na podlagi značilnosti lastnosti in tehničnih značilnosti elektronskih dokumentov, ki zagotavljajo možnost njihove nadaljnje uporabe.*

**Ključne besede:** *digitalni zapisi, vrednotenje digitalnih zapisov, digitalni arhiv, verodostojnost ponovnih zapisov, dolgoročna hramba*

## 1 INTRODUCTION

Mass digitalization of all spheres of the economy and society is becoming a prerequisite for the emergence of a new digital format of public relations, the historical course of time. Information technologies are being intensively introduced into absolutely all spheres of public life: politics, economics, public administration, culture, education, etc. In Kazakhstan, consistent work on the introduction of information technologies into the public administration system, including the work of office services and archives, was started back in the 90s of the last century. Over the years, several state digitalization programs have been implemented: The State program for the formation and development of the national information infrastructure of the Republic of Kazakhstan (Decree of the President of the Republic of Kazakhstan dated March 16, 2001 No. 573), The State Program for the Formation of "Electronic Government" in the Republic of Kazakhstan for 2005-2007" (Decree of the President of the Republic of Kazakhstan dated November 10, 2004 No. 1471), The State Program "Informational Kazakhstan – 2020" (Decree of the President of the Republic of Kazakhstan dated January 8, 2013 No. 464). As a result, the Unified Electronic Document Management System for State Bodies (EDMSSB), an "electronic government" portal, the Intranet Portal for State Bodies (IPSB), other state databases and information systems have been successfully implemented and are functioning in the country.

To date, the share of electronic documents in the interdepartmental workflow has reached 86%, more than 3 thousand sets of publicly available data of state bodies of various levels are available online, which can be easily found, downloaded and used. The transfer to the electronic type of state accounting activity is carried out in order to provide state services to individuals and legal entities, new and existing information resources are being constantly developed. The legal status of the use of an Electronic Digital Signature (EDS) has been fixed. State information systems have accumulated a significant amount of data, the provision of long-term and permanent storage of which requires a practical solution.

Digital technology exerting a direct impact on the archives that preserve its role as the main guardians of both analog and digital information. Over the past decade, Kazakhstan's archives have achieved certain results in automation of its work and implementation of computer technology. In these circumstances, an urgent task is to revise preconceived ideas of the document itself and its carriers and methods of work with them, including the methodology for the selection of the documents and determine the extent of their value.

## 2 LITERATURE OVERVIEW

Methodological and practical issues of the examination of the value of electronic documents are the subject of research by a number of archivists.

The most significant research should be considered the research of the International Project InterPARES, related to the organization of permanent storage of electronic documents in information systems. In the report the research group InterPARES marked "electronic records must be appraised from the same theoretical and methodological standpoint as traditional records". Head of project Luciana Duranti makes a conclusion, that "with electronic records, the function of appraisal has changed in four fundamental ways: first, the appraiser must assess the authenticity of the records considered of continuing value; second, the appraiser must determine the feasibility of the preservation of the authenticity of the records; third, the appraisal decision must be made very early

in the life of the records; and, fourth, the appraiser must constantly monitor the records of the creator and, if this were warranted by the changes that they have undergone, revise the appraisal decision" (Duranti, 2002).

A great contribution to the development of the theory of examination of the value of electronic documents was made by the famous Canadian archivist Terry Cook, who considered the assessment of electronic documents not as a special project, but rather as part of a strategic acquisition policy that follows the traditional analysis of the functions, actions and procedures of office work of all departments of the organization (Cook, 1991).

Also, in the surveys, the examination of the value of electronic documents is considered in detail in the works of the Russian scientist V. Tikhonov. He notes that "The methodology for selecting electronic documents for long-term storage also has some specificity compared to traditional archival materials. This applies both to the assessment of the content side of documents and selection criteria in general, and to the forms of carrying out procedures for the examination of value" (Tikhonov, 2009).

Unfortunately, in the small number of studies of Kazakhstani archivists, this problem remains practically unexplored.

### **3 RESEARCH DESIGN**

In accordance with the national legislation of Kazakhstan, the examination for the value of documents is carried out in order to select documents classified as part of the National Archives Fund (NAF), prepare them for transfer for permanent storage to the appropriate state archive, as well as determine the storage periods for documents and allocate documents with expired storage periods for destruction.

Evaluation of documents and their content is carried out at almost all stages of creation and processing, starting from writing the content, agreeing, determining the form and type of the final version of the document; the procedure for bringing it to the addressee, establishing a registration system, choosing a place and method of storage.

The first stage in the examination of the value of documents can be considered the compilation of a nomenclature of cases, when the storage periods of the created documents are determined.

The second stage of the examination of the value of the documents themselves is carried out when the documents have left operational work, in preparation for their long-term storage and transfer to the archive of the organization.

In the third step specifies the value of the documents when transferring them to permanent storage in the state archives and the destruction of documents with expired storage period.

Examination of value is carried out on the basis of: regulatory legal acts, guidelines and instructions, as well as lists of documents indicating storage periods and nomenclatures of organizations. For the assessment, the criteria and origin, content, external features of documents are applied in a complex manner.

The criteria for the origin of documents include the role and place of the organization, the significance of the tasks and functions it performs, the importance of an individual in the life of society, the time and place of formation of the document.

The criteria for the content of documents include the significance of the event reflected in the document, the value of the information contained in the document, its repetition in other documents, the authenticity, kind and type of document.

The criteria for the external features of the document include the authenticity of the document, the legal reliability of the document, the form of recording and transferring the content of information, the features of the material medium and the physical condition of the document.

For electronic documents, additional special criteria are approved by law:

- integrity of metadata,
- authenticity of electronic documents,
- absence of duplicate information in documents previously accepted for archival storage.

However, the normatively does not provide for a separate methodology and technology for the examination of the value of electronic documents.

In 2018, the state archives of Kazakhstan started to implement the project "Single Archive of Electronic Documents" (SAED). Its main task is to ensure storage, management and the possibility of further use of electronic documents that are created in state information systems, incl. EDMSSB. The information system made it possible to automate the work of both departmental and state archives. The processes of acquisition of the archive, accounting and examination of the value of documents, storage of archival documents have been automated. Web portal IS "EDMSSB", which provides users online access to archive resources, was created. The functionality of the web portal allows you to carry out full-text and attributive search of archival information with "open access", to submit applications for providing access to archival documents. Integration bus is used for integration with external information systems of state bodies.

IS "EDMSSB" provides automation of functions of administration and differentiation of access, as well as provides the ability to monitor and analyze data through the software tools of IS "EDMSSB". As noted above, the main source of replenishment of the system is the integrated with it SAED and IPSB, functioning in all state bodies of the republic. After operational storage in them, electronic documents are sent through dedicated communication channels to the "Departmental Archive" module of the SAED, which ensures the reception of data from the structural divisions of the organization, their ordering, the execution of case inventories, acts on the allocation of documents for destruction, their coordination with the state archive and approval, organization of work of expert commissions. Electronic documents are transferred to the SAED in a package that includes an attached file, EDS, electronic registration and control card and metadata.

As a result, about 30TB of data for 2007-2018 was migrated from the electronic document management systems of state bodies to the SAED. In the process of implementing the project, Kazakhstani archivists faced a number of methodological problems related to both the assessment of the content side of the documents and selection criteria in general, and the determination of the forms of carrying out procedures for the examination of value.

It became obvious that if in relation to the substantive part of electronic documents it is possible to apply the methodology for evaluating traditional documents, then with regard to technological characteristics, a revision of special criteria is required, in particular, problems of certification and authenticity of electronic documents.

Thus, the system accepts documents only after confirming the validity of their electronic digital signature (EDS), as the main condition for their legitimacy and authenticity. All documents that did not pass this check are allocated in a separate act and, depending on the type and content, the presence of a paper original, a decision should be made on their further fate. The law "On the National Archival Fund and Archives" gives the archivists the right to certify the electronic version of the document with their EDS if there is a

paper original. But the question of authenticating documents created only in electronic form, the EDS of which is not valid, remains unresolved.

And here we can agree with Tikhonov, who notes that "designed to provide electronic documents with legal force and thereby give them the proper long-term value, the existing EDS, on the contrary, leads to a noticeable reduction in the period of use (and therefore storage period) of an electronic document" (Tikhonov, 2009).

As a tool for confirming the legitimacy of an electronic document, one can consider checking the receipt of the "timestamp", which is generated in the electronic document management system at the time of signing the document (which is already used in a number of foreign countries). For this, it is necessary to establish normatively not only the concept of "time stamp" itself, but also the development of a mechanism for its use when confirming the legal force of an electronic document.

The period of temporary storage of electronic documents in organizations of Kazakhstan is 5 years, after which they are transferred to the state archives. The types of documents created only in electronic form (without duplication on paper) and their storage periods are approved by the List of standard documents generated in the activities of state and non-state organizations, indicating the storage periods. And if earlier documents could be created only in electronic form, the storage period of which did not exceed 10 years, then from January 1, 2018 this requirement has been canceled and documents of permanent and long-term storage are already being created in electronic document management systems. On the basis of this List, the organization develops and approves a nomenclature of cases, according to which electronic documents, entering the SAED, are formed into cases. An internal inventory is automatically generated for each case in the system. It is checked and corrected by the responsible employee of the archive, signed by his EDS and included in the file. This functionality is based on the essential difference between electronic documents and paper documents - the possibility of their machine processing.

### **3.1 METODOLOGY**

The work is based on the results of the analysis of the national archival legislation of Kazakhstan, generalization of the practical experience of the work of Kazakh archivists with electronic documents and transmissions and their archival storage. Special literature and research on the problems of examination of the value of archival documents by domestic and foreign authors were studied.

The methodological basis of the research was formed by the principle of scientific objectivity, a systemic and dialectical approach to the problems of cognition. The study attaches particular importance to the method of comparative and complex research. The study of the topic was carried out from theoretical knowledge to the isolation of problems and their analysis based on the accumulated factual materials. The work is presented according to the problem-thematic principle.

### **3.2 LIMITATIONS OF THE RESEARCH**

The study is based on the results of the implementation of the information system "Single archive of electronic documents" and the experience of the state archives of Kazakhstan with electronic documents.

## 4 RESULTS

Thus, to date, Kazakhstan has formed certain regulatory requirements for the examination of the value of electronic documents and the acquisition of archives with them. In accordance with the Law "On the National Archival Fund and Archives" electronic documents are accepted for state storage and included in the NAF special criteria for the selection of electronic documents has been approved, and types of documents created only in electronic form have been established. However, the existing regulatory legal framework is clearly insufficient for organizing a full-fledged examination of the value of electronic documents.

The implementation of the SAED project in Kazakhstan has shown that ensuring the safety of electronic documents is a complex and costly process. In this connection, the issue of the selectivity of electronic documents for permanent storage, depending on their value (as well as in the case of paper documents) remains relevant.

## 5 DISCUSSION

The main methodological problems in the selection of electronic documents are in the selection of criteria, primarily in relation to their technological assessment. Therefore, the traditional method of assessing the value of archival documents should be revised taking into account the essential characteristics of electronic documents. So, along with the criteria of origin, content and external features, criteria for assessing technological characteristics become equally important, and in some cases, the main ones: ensuring their availability in the future, the ability to read from the information carrier, correctly reproduce, and most importantly, guarantee their authenticity and integrity.

It also becomes obvious the need to develop a methodology for automatic selection of electronic documents using modern information tools. This would significantly optimize and simplify the process of examining the value of electronic documents, as well as exclude or minimize the direct participation of specialists.

## 6 CONCLUSIONS

In modern conditions of the uncontrollably growing volume of digital information, the main problems of the examination of the value of electronic documents are to identify which of them are subject to temporary and which to permanent storage. At the same time, the traditional methodology for selecting documents for permanent storage does not provide a solution to these problems. There is a clear need for the development and automated methods and forms of selection of electronic documents using modern information technologies and tools. Revision of the criteria for evaluating electronic documents requires special attention. Unlike paper documents, such characteristics as legitimacy, integrity and authenticity are of particular importance. This requires the development of an appropriate regulatory legal and methodological framework.

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*Typology: 1.02 Review article*

# ATLANTI GUIDELINES FOR AUTHORS

## 1. Journal scope and content

Atlanti are journal published by the International Institute for Archival Science of Trieste and Maribor. It has an international editorial board and publishes original research, scientific and professional articles and discussions of archival issues and records management. Atlanti have been published since 1991. It is published once a year in two volumes. The issues are thematic.

**2. Published articles are in the official languages of the IIAS English, Italian and Slovenian** as a rule, however other languages are accepted with the decision of the editorial board. All articles must have the abstract, summary and key words in English and abstract in national language if text is written in national language of the author.

## 3. Format and structure of contributions

Authors use Times New Roman 12p. The text should not be shorter than 8 pages 15.000 characters with spaces (8 pages) and not exceed 30.000 characters with spaces (including tables, pictures and the list of cited sources and references (16 pages).

Information **about the author** should be stated before the title in full form (name and surname). If there are more authors, they should define the order of their names. Any academic or professional titles, institutional affiliation, address and e-mail address should also be stated. The author should also provide a short biography.

**The title (subtitle)** should be concise and informative. It should specify the content of the article. The title should contain words suitable for indexing and searching. Title and subtitle have to be in the original and English language.

**The abstract** should clearly define the purpose, methodology and approach, major findings and results as well as conclusions of the article. It should be prepared according to IMRAD formats or compliant with ISO 214. It should not exceed 250 words. It should be written in English and in the national language. The author has to define up to 5 key words suitable for indexation.

### Example:

#### **Abstract**

**Purpose:** Archival science and Museum science in museums are working in close cooperation. In the process of...

**Method/approach:** The method used in our paper is case study, with which we demonstrated the usefulness of archival science in museums in practice...

**Results:** Description of archival records has an important role in museum archives and storage rooms, since it allows employees to...

**Conclusions/findings:** Museum and Archival science work closely together in museums and they need each other... Due to this, it is possible for the archivist and curator documentarist to look for common solutions in the field of record/documentation management and storage.

**Keywords:** *archival science, museum science, museum, museum storage room.*

**Main text** of the article (minimum 15.000, maximum 30.000 characters with spaces) is followed by the reference list and summary in English. The summary should not exceed 400 words. Summaries of contributions, written in other than English language, must be written on at least 2 pages.

**Paragraph levels** should reflect the organization of the article. Chapters can be divided into subchapters. Numbering should follow SIST ISO 2145 and SIST ISO 690 standards (that is: 1, 1.1, 1.1.1 etc.).

#### 4. Footnotes

**Footnotes** are placed at the bottom of the page and numbered with ordinal numbers from the beginning to the end of the article. Footnotes should provide additional text (author's comments) and not bibliographic references - those can only be referred to. If the footnote refers to the whole sentence or paragraph, it is placed after the punctuation mark. If it refers to the last part of the sentence or only to the last word, it should be placed before the punctuation mark.

#### 5. Figures and tables

The article can also include figures (photos, graphics, maps, sketches, diagrams etc.) and tables, which should be numbered. Each figure and table should have a title. Titles are written above the table and figure (Table 1, Figure 1).

If graphics are not the result of author's work, a source has to be quoted. All graphics have to be referred to in the text (see Figure 1, see Table 1) and suitable for black and white printing. Pictures should be scanned in an appropriate resolution (at least 300 dpi), saved in .jpg, .tiff or .png format, submitted as a separate file and appropriately titled.

#### 6. Citation of authors and references

**For the citations authors should use APA Style and In-Text citations.**

For more detailed instructions and examples on APA Style, see: <https://apastyle.apa.org/> or [https://owl.purdue.edu/owl/research\\_and\\_citation/apa\\_style/apa\\_formatting\\_and\\_style\\_guide/in\\_text\\_citations\\_the\\_basics.html](https://owl.purdue.edu/owl/research_and_citation/apa_style/apa_formatting_and_style_guide/in_text_citations_the_basics.html)

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- In-text references include the surname of the author(s) and year separated by a comma: ... (*Carruci, 2006*), *Carruci (2006) showed that . . .*
- For two authors, use an ampersand in brackets or an and in running text: . . . (*Šauperl & Semlič Rajh, 2013*), *Šauperl and Semlič Rajh (2013) reported that . . .*
- For more than two authors, cite only the surname of the first author followed by et al.: . . . (*Carruci et al., 1980*), *Carruci et al. (1980) believe that . . .*
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- If only the editor of the work is known and no person is named as author, the editor(s) should be indicated in the same manner as for indicating the author.

For Internet sources, cite known authors as usual. If no author or date is given, use the title in your signal phrase or the first word or two of the title in the parentheses and use the abbreviation "n.d." (for "no date"). Example: ("Tutoring and APA," n.d.).

- Distinguish references to more than one publication by the same author in the same year a, b, c and so on: . . . (*Novak, 2002a, 2002b*), *Novak (2002a, 2002b) presented . . .*
- Publications stated as an example are indicated as follows: (*see Klasinc, 1999 or Ratti, 2001*), (*for an overview, see Johnson et al., 2006 and Smith, 2007*)
- For secondary references, indicated the author(s) and year of the primary source, followed by the author(s) and year of the secondary source: (*Line, 1979, as cited in Mihaljič, 1984*)
- If the work is still in press, state this in place of the year

- When the work does not have an author move the title of the work to the beginning of the references and follow with the date of publication. For example (*Merriam-Webster's*, 2003).
- Quotations should be marked with double quotation marks (" ") and page number: "The modern librarians have more competencies" (Leight 1996, pp. 4-5).

## 7. Reference list

Cited sources should be listed at the end of the text in a separate chapter "Reference list". This chapter should consist only of sources which are referred to in the text. Titles of monographies should be written in italics as also articles' titles and year of publishing. All information should be written in original language.

### Examples:

#### Archival sources:

Document title, name of fond or collection, container/box number and Institutions/Archives name.

Photographs of Robert M. Yerkes (ca. 1917–1954). Robert Mearns Yerkes Papers (Box 137, Folder 2292), Manuscripts and Archives, Yale University Library, New Haven, CT, United States.

#### Books:

##### Basic Format for Books:

Kippendorff, K. (2004). *Content analysis: an introduction to its methodology*. 2<sup>nd</sup> ed. Thousand Oaks, CA: Sage.

Carruci, P. (2006). *L'archivistica tra diplomatica e informatica: inaugurazione del corso biennale, anni accademici 2004-2006*. Citta del Vaticano.

##### Edited Book, No Author:

Leitch, M. G., & Rushton, C. J. (Eds.). (2019). *A new companion to Malory*. D. S. Brewer.

##### Edited Book with an Author:

Malory, T. (2017). *Le morte darthur* (P. J. C. Field, Ed.). D. S. Brewer. (Original work published 1469-70)

#### Contributions or chapters in books, encyclopaedias:

Gregory, I. (2008). Using Geographical Information Systems to Explore Space and Time in the Humanities. In Greengrass, M., Hughes, L. (eds.), *The Virtual Representation of the Past* (pp. 135-146). Farnham, Surrey: Ashgate.

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Sendi, R. (1995). Housing reform and housing conflict: The privatisation and denationalisation of public housing in the Republic of Slovenia in practice. *International Journal of Urban and Regional Research*, 19(3), pp. 435–446.

Denny, H., Nordlof, J., & Salem, L. (2018). Tell me exactly what it was that I was doing that was so bad: Understanding the needs and expectations of working-class students in writing centers. *Writing Center Journal*, 37(1), 67–98. Available at <https://www.jstor.org/stable/26537363> (accessed on 15.11.2019).

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