

Public Records Review: A Response from the Digital Preservation Coalition

Introduction

1. The **Digital Preservation Coalition (DPC)** is a not-for-profit membership organisation whose primary objective is to raise awareness of the importance of the preservation of digital material and the attendant strategic, cultural and technological issues. Its vision is to make **our digital memory accessible tomorrow**.
2. We note and welcome the progress that has been made since in the Shaw Report outlined flaws in the creation and maintenance of records in public authorities. We support the view that these weaknesses are best resolved by focussed renewal of the framework of public records. This provides an opportunity to improve accountability and transparency which in turn enhances governance and supports the improved delivery of national outcomes. Our response is focussed on those elements of the consultation that pertain to digital records and digital preservation (questions 1, 5, 6, 9, 10).
3. We **welcome the explicit statement that digitized and ‘born digital’ materials constitute a public record**. We note and support the focus on informational content and the consequent need for ‘technology proofing’ and the management of formats. **We offer our assistance in identifying and resolving issues that may arise**.
4. We note the proposed role for the Keeper to provide guidance for public authorities. Research shows that clear advice about the preservation of digital materials is both in high demand and can be difficult to procure. Therefore we offer our help in two ways: to assist the Keeper in the **production of specialist advice** notes; and to support the Keeper in the **wider dissemination of advice** to a diverse audience that is hungry for solutions.
5. We welcome the requirement that public authorities produce records management plans using models defined by the Keeper. This represents an opportunity to build capacity for digital preservation in a diverse range of public authorities. Recognising that information is an asset, this new requirement has the **potential to support a range of national outcomes, bringing economic advantage and enhancing the conditions for innovation**.
6. The membership of the DPC includes museums, libraries, data centres and archives in a variety of sectors; public sector agencies that fund content development; rights holders; professional bodies; and researchers. This response has benefitted from discussion amongst this diverse community. Note that the National Archives of Scotland have not participated in developing our response to this consultation, and that members of the Coalition may also be submitting their own responses directly.

Definition and Extent

7. You asked (1), 'Do you agree that a public record is one that is created or received by a publicly funded authority, or do you think that the 'public' status of a record is determined by the information that it contains?'
8. We have no detailed comment to make on this question, except to observe that either definition would include digital objects and create a requirement for improved digital preservation services.

Formats and Technology Proofing

9. You asked (5), 'Do you agree that the definition of a public record should focus on the informational content rather than the physical format of the record?'
10. Yes, we believe that the definition should focus on the informational content rather than physical format. The preservation of physical media is technically challenging, greatly impedes access and creates unsustainable technological dependencies in the medium and long term. The physical media on which a record is held is a reasonable concern within digital preservation and attention should be paid to ensuring the durability of storage media. But experience shows that attention to physical media alone is not sufficient to ensure continuing access – issues like file format, representational information and administrative metadata also need to be addressed.
11. We would advise that too narrow a definition of 'informational content' can hamper preservation. For example the migration of a relational database will require access to codes and lookups as well as appropriate data models. Consequently preservation of informational content should also take account of such contextual information as may be necessary to access the information.
12. You asked (6), 'Are there other issues that need to be considered in relation to technology and future-proofing?'
13. Yes, there are a number of issues that need to be considered in relation to technology and future proofing, though these need not be an impediment to your proposals. The DPC would be happy to contribute in more detail to this topic. We will not repeat this in detail here as much of the advice which we would recommend is already published and much of it freely available from our website. Important issues will include: the identification of file formats for preservation; understanding and planning for the implications of a migration or emulation strategy; gathering sufficient metadata to ensure continuing access; identifying 'significant properties' within data; the assurance of authenticity within of data management; and developing, documenting and monitoring the custody of records. We note also the shortage of capacity within the sector, the need to harmonise processes for paper and digital records, and the need for the development of digital preservation strategies within public authorities.

Record Keeping Requirements of Public Authorities

14. You asked (9), 'Do you agree that the Keeper should be responsible for producing and publishing a model records management plan to guide public authorities?'
15. Yes, we agree that the Keeper should be responsible for producing and publishing model records management plans to guide public authorities. It is important that guidance comes from a clear and recognised authority and given the context and nature of the advice it is hard to imagine what other office could produce this advice.
16. We believe that the advice would be enhanced and better received if it were subject to appropriate scrutiny and review before being issued and we anticipate that the Keeper will already have considered this. The DPC – an independent agency which brings together an extensive range of expertise pertinent to digital preservation – is well placed to support this work as it pertains to digital records and their long term management. We note the risk of fragmentation as agencies in different sectors strive to comply with different mandates and requirements for digital preservation. Moreover, the relative speed at which digital tools and services emerge and are adopted mean that it will be helpful to update and revise good practice guidance for the management of digital records on a regular basis. Therefore we offer our support either formally or informally to help develop, review and update that advice.
17. We also note that there is a documented and clear demand for guidance on the topic of the management of digital records and that this demand is international in scope and diverse in sector (eg Angevaere 2009, Boyle et al 2008, van der Hoeven 2009, Sharpe and Waller 2006). Consequently, although the audience for the current proposals are limited to designated authorities in Scotland, it is reasonable to assume that elements of the advice will be influential among a larger and more diverse range of institutions that seek solutions to challenges with the management of digital records. We therefore also offer our support to promote, amplify and communicate good practice to a wider audience. This will bring attention to the work of the National Archives of Scotland and will reduce the risk of unnecessary fragmentation within the wider community.
18. You asked, (10) 'Do you agree that public authorities should be required to produce records management plans, following the Keeper's model and with the Keeper's approval, within a certain time?'
19. We cannot comment in detail on the substantive elements of this question, but we observe that the requirement to produce management plans is intended to have the welcome result of improving the management of digital records within public authorities. Research shows there is lack of capacity within the sector to deal with digital preservation (e.g. Boyle et al 2008, Sharpe and Waller 2006). This will go some way to

delivering two key outcomes – enhanced records management and enhanced capacity within the sector to support electronic records.

Participation and recusals

20. This response has been prepared for the DPC by its Executive Director in consultation with its Board and relevant associated organisations. However we note that the National Archives of Scotland, normally represented on the DPC board by Bruno Longmore, has not contributed to this response.

References

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