



Saskatchewan Council for Archives and Archivists

Response to report to be presented to City of Regina Finance & Administration Committee

24 April 2007

Several elements of this report are troubling:

- There appear to be some basic misunderstandings and mistaken assumptions about both archival and records management functions
- In particular, there appears to be an assumption that responding to reference enquiries is the sole function of an archives. This couldn't be further from the truth, as detailed below. The report also fails to recognize the work (arrangement, description, and preservation) required in order to *provide* effective reference service
- There seems to be an assumption that other organizations will act to fill the gap left by a less than fully functional City Archives, or indeed that existing collections will meet researchers' needs. This ignores the fact that archival records are unique; and in particular that records created by the City, which are publicly owned, provide evidence of corporate actions over time
- There is an inference that there is a transitory nature to the value of records, and that access to information is easily achieved; and a troubling distinction being made between a "corporate archives" and one providing service to the public

We are particularly distressed that the permanently valuable records of the City, documenting actions and decisions taken, to which all citizens have legally mandated access, should be targeted for a cut when the City is able to find \$1,316,100 for various communications exercises and *four* new managerial positions within the City Manger's office. The amount saved through the reduction in service and access to the City Records represents 5.9% of this total increase.

Citing the Report:

"In 2004 the City of Regina undertook a Core Services Review to identify choices for redefining excellence....This ranking process identified that the services provided by the City of Regina Archives (CORA) are considered to be a discretionary item..."

This appears to be incomplete information at best. Documents available on the City's website (http://www.regina.ca/content/city_hall/core_services/) indicate that:

- a consulting firm, TkMC, was contracted in 2004 to undertake a core services review for the City of Regina. “Archival support” (\$53,000) was identified in TkMC’s report as a candidate for discretionary savings. This appears to refer to the archival assistant position, not the city archivist position and certainly not the program as a whole (as is inferred in the report being presented to the Finance and Administration Committee)
- TkMC’s report appears to have been received by City Council for information, with a consultation and approval process which culminated in the presentation of a report to City Council in September 2006. The 2006 report makes it clear that the discretionary items in the original report “suggested by TkMC” were not approved by any City governing body (appendix E, page 1)
- in the report presented to City Council in September 2006 (“Continuous Improvement and Innovation - Response to the Core Services Review Report”), **this item was moved to the list of programs *not* deemed discretionary**: “There is a legislated requirement for an urban municipality to archive specific documents and records. A number of years ago, City Council approved the current program that includes a City Archivist. A change to funding would result in returning to a program in partnership with the Provincial Archives. It is recommended that this item NOT be deemed discretionary.” (Appendix E, page 12)

“The Cities Act provides that a city must establish a records retention and disposal schedule and all documents of the city must be dealt with in accordance with that schedule. There is no legislative requirement for the City of Regina to operate an archive.”

- The *retention* aspect of any records management program is the institutional archives.
- The *disposal* aspect of any records management program should include a final audit by an archivist. The necessity of this is recognized by numerous federal and provincial statutes which demand no government records may be destroyed without the approval of the national/provincial archivist.

“...the City of Regina created its own Archive Office at 2390 2nd Avenue. The City of Regina has a lease on the space until 2012.”

- We are concerned with the report’s failure to specifically note the future of its existing archival holdings, particularly given this reference to the end date on their facility’s lease.
- We recommend archives be located centrally to the administrative offices of the institution they serve. Fully functional and properly resourced archives primarily benefit their sponsor agency.

“The primary purpose of CORA is to act as the corporate archive for the City of Regina...The amount of private records being donated to CORA has not been significant.”

- The records of the City should be accessible to the citizens of Regina and other interested researchers. Throughout this report, there appears a troubling

distinction being made between a “corporate archives” and one providing service to the public. There should be no such distinction. The records of value to the corporation – those providing documentation of actions taken – should be available to the public. It would be false to assume the public is interested only in the “private records” documenting the City – these are records which can and should augment the corporate record, and can themselves be of value to the City administration.

- This report also fails to mention annual accruals of corporate records as the result of their records management program. This strongly suggests records management has not been given the resources necessary, and transfers of permanently valuable material have not been occurring on a regular basis. Please see below, “An alternate approach to consider.”

“*CORA processes 200-300 requests for information each year.*”

- Focusing on the number of requests, without reporting the number of files and items retrieved, is misleading. Cumulatively, between 2004-2006, CORA retrieved 10,975 files, architectural plans, or photographs – an average of 2,744 each year. Between June 2004 and March 2007, its on-line database of photographs received 1,174,880 “hits,” or an average of 34,555 per month. (These latter figures, in themselves, should indicate the value of contextual archival description in aiding access and retrieval). Between 2004 and 2006, the photographic holdings alone increased by 68.7%, and requests for digital reproductions increased by 951% between 2005 and 2006. We suggest that these figures reflect a resource steadily and increasingly used.
- In addition to responding to reference enquiries, archivists must appraise, process, arrange and describe their holdings; make these descriptions available; and increasingly, ensure availability on-line. Reference to enquiries alone suggests this is the sole function of the archival process, and therefore provides a false impression.

“*...there is no dedicated community archive in Regina...*”

- The corporate records of the City of Regina are owned by and belong to the citizens of Regina. The inference that other organizations can or should be expected to fulfill this mandate on the City’s behalf benefits neither the City nor the public, particularly given the City’s legal obligations under the *Local Authority Freedom of Information and Protection of Privacy Act*.
- The collections primarily cited by the City – the *Leader-Post*, University of Regina Library, and the remaining Prairie History Room collection – are either privately owned (*Leader-Post*) or are library (i.e. published), not archival, collections. The issues of access, as well as content, cannot be considered the same for these holdings as for records created by the City, which are publicly owned, and which provide evidence of their corporate actions. The City’s records such as minutes and bylaws, architectural plans and building permit histories, are not available anywhere else but the City.

“*Many of the requests for information...can be referred to these other areas.*”

- as noted above, this is simply false. Archival material by definition is unique; unlike published library materials, identical archival collections cannot be found in a variety of institutions. No other Saskatchewan institution has a mandate to specifically acquire, preserve and make accessible the archival resources of the City of Regina. Moreover, past national surveys indicate if properly resourced, the City Archives would primarily result in a benefit to the staff of the City, not only the public it serves.

“The services provided by this area are closely linked to the services provided by Corporate Records staff in the City Clerk’s Office.”

- One of the most troubling aspects of this report is its inference that there is a transitory nature to the value of records, and that access to information is easily achieved. While it may be true the Corporate Records staff provide access to current and active records, it is unlikely they can successfully manage access to an increasingly growing collection of permanently valuable, historic records. Moreover, it is especially unlikely they will undertake the level of detailed access and on-line availability demonstrated by the City Archives to encourage use of its resources.

“This involves an office open to the public during business hours.”

- We assume the Corporate Records staff, the City Clerk’s Office, and other municipal departments are, in fact, open during business hours. It is even possible they are open to the public during these hours. As with other city offices, the work of the Archives goes well beyond direct public service requests. The archival collection, and access to it, is the result of appraisal, appropriate preservation measures, arrangement, context-based description, and attention to current privacy, access and copyright laws. Outreach activities on the part of the archivist include community events, publications, and increasingly, providing access where possible via on-line exhibits, databases, and websites.
- Given the lease and utilities on the CORA facilities, the fact that the building is open does not, in itself, constitute an undue expenditure.

“The management of Corporate Records for the City of Regina is a higher priority...than...public access to the collection through an office that is open during business hours.”

- The public are the owners of the corporate records of the City. Access to corporate records is defined through the *Local Authority Freedom of Information and Protection of Privacy Act (LAFOI)* – including corporate records held in the Archives. This statement would seem to suggest that the records belong solely to the city administration, not to the taxpayers of the city. This is false. It does, however, clearly demonstrate a chilling attitude of non-disclosure to public records which should not be tolerated in a publicly-funded institution operating in a democratic society. For records which can be made accessible, the most cost-effective means by which to do so is via the City Archives.

“The Administration will be reviewing the fees and charges related to the provision of CORA information....”

- The *LAFOI Act* provides a schedule of fees for public records available via the Act.

“...while still allowing the remaining staff member to work on records management projects.”

- This would suggest responding to reference enquiries is the sole function of an archives. As described above, this is not true. Neither management of the archival collection, nor appropriate attention to “records management projects,” would be well-served by attempting to staff both with a single, junior position.

An alternate approach to consider:

We are in agreement with the City Clerk and City Manager that they have not properly resourced the records management program. Neither have they properly assessed the value of the archival program. We suggest the City consider creating an office of Archives and Records Management. Many archival programs play an integrated role in records management. Winnipeg is an example of city that has adopted this model; information about that program is available here:

<http://www.winnipeg.ca/clerks/docs/archives/archives.stm>

For an example of the incorporation of the archives’ role in records management, please see:

<http://web2.gov.mb.ca/laws/statutes/2002/c03902e.php#109>

And for a sample records management by-law, please see:

<http://www.winnipeg.ca/CLKDMIS/DocExt/ViewDoc.asp?DocumentTypeId=1&DocId=148>

We believe this can be managed within the existing budget and without unduly harming any of the current initiatives of the City; indeed, this would strengthen both programs and support legislative and risk management requirements.