

## Written evidence submitted by The National Archives

### Executive summary: Impact of COVID-19 on the archive sector

1. The National Archives is a non-ministerial government department of the Department for Digital, Culture, Media and Sport (DCMS), funded directly by HM Treasury. We submit this evidence to the committee, with the agreement of DCMS. Our position within government requires a different approach to some of the questions posed by the committee, we have nonetheless sought to present information that is of relevance and value to the inquiry.
2. Our insights and expertise to comment on the impact of COVID-19 on the sector derives from, firstly, our strategic sector leadership role and secondly, from our position as a lead practitioner in the field, both nationally and internationally. The impact of COVID-19 is far reaching across the breadth of the archive sector, affecting custodians of archives across businesses, local authorities, universities and charities. Almost every aspect of archives, from daily operations to its existential future has been profoundly affected. At a time of competing pressures on the sector, the most significant effects of COVID-19 on the archive sector are those that represent a risk to archival heritage, which in effect threatens an essential resource for upholding democratic principles dependent on transparency, scrutiny and accountability.

#### The threat to archival heritage: A risk to scrutiny, accountability and transparency

3. The risk to archival heritage is one of the most pressing threats facing the sector, as a result of the pandemic. The loss of archive collections has ramifications that extend beyond the loss of national memory, as it limits the capacity of citizens, civil society and sections of the state to exercise and enforce accountability and transparency. Within the archive sector exists a system of Places of Deposit, by which over 200 archives services around the country are appointed to preserve and provide access to public records, under the provisions of the Public Records Act 1958 (see annex: section A).
4. Access to archives particularly Places of Deposit and the records they hold, are essential resources and levers for applying scrutiny and accountability over government agencies and authorities. We therefore want to bring to the attention of the committee the three most urgent risks elevated by COVID-19, that represent a threat to archival heritage and the democratic functions it enables. These are:
  - Vulnerability of archive services to financial collapse
  - Disruptions to the delivery of public tasks and information legislation
  - Exposure to failures for archive services unable to accelerate the transition to digital

#### Vulnerability of archive services to financial collapse

5. The contraction of the economy has increased the risk of financial collapse to custodians of archives of all types. In partnership with the UK Crisis Management Team, we are working with administrators and insolvency practitioners to help ensure business archives are not lost over the next few months. Since the pandemic, interventions have been required more frequently, recent examples include Ede & Ravenscroft Ltd, TUI, Laura Ashley Ltd and Flybe Ltd. Across the sector, archive services frequently represent a small body/function of a wider organisation, therefore in situations where it falls outside its organisation's core functions, archive services can easily be overlooked when budgets are scarce. This is a significant risk for archive services held by local authorities. If local authorities were to reduce budgets for archive services (in addition to historical reductions), these services could have insufficient resources to meet archives accreditation standards for the preservation and security of collections. The vulnerability of archive services to financial collapse is particularly acute for those who have adopted models that have moved away from core funding, as a means to increase their financial resilience. In many of these cases, diversification of their income revenue, for instance towards a mix of venue hires, events, catering services and retail, has meant higher financial dependence on visitor/user footfall- income which has disappeared during the lockdown phase with the reduction of visitor numbers to zero.

#### Disruptions to the delivery of public tasks and information legislation

6. The Public Records Act 1958 requires central government departments, and certain other public bodies, to identify records of historical value and transfer them for permanent preservation to The National Archives, or to another appointed Place of Deposit, by the time they are twenty years old. During the pandemic, The National Archives through the authority of the Keeper of Public Records, and other Places of Deposits have suspended all incoming paper and digital transfers until further notice. The temporary suspension of this public task means that records that would have been deposited to The National Archives or another Place of Deposit under the Public Records Act 1958 this year, are unlikely to be accessible within the timeframe that the Act specifies. This coincides with the temporary relaxation of the Archive Service Accreditation scheme (see annex: section F), also a consequence of the pandemic, which may have an impact on Places of Deposit complying with statutory obligations under the Public Records Act 1958. This is because the accreditation service is the main operational framework that guides archive services towards managing collections and access in a way that is aligned with the principles and duties under the Public Records Act 1958. While day-to-day responsibility for local authority Places of Deposit is delegated to the Keeper, the Secretary of State still maintains the responsibility to intervene to safeguard public records at risk, if a Place of Deposit were to fall into serious difficulties.

#### Exposure to failures for archive services unable to accelerate the transition to digital

7. Through *Archives Unlocked*- the government's vision for the sector- we have been working with archives to develop digital capacity and infrastructure. While there has been progress, the sector is not at the stage of digital maturity to meet the digital challenges that have emerged from the pandemic. Two of the most pressing challenges in this area, are firstly, the capability to capture the complex digital records to document the pandemic and secondly the capability to increase the digital offer to audiences.
8. The archival sector is critical for capturing and preserving the immensely complex digital records created during the COVID-19 pandemic (including algorithms, rough or raw data, extensive web and social media archiving). The National Archives is archiving key government websites and social media channels in the UK Government Web Archive, however, across the sector the digital capability to capture the information on COVID-19 responses and events is varied. Another digital challenge relates to the long-term barriers in reaching audiences. It is widely expected that there will be a large decrease in the footfall of the traditional audiences due to the more senior age of people who tend to visit archives services. Additionally, there is likely to be an adverse effect on the footfall of underrepresented groups, i.e. BAME and people with disabilities, because of either higher vulnerabilities or increased barriers caused by COVID-19. In our recent survey to archive services, only 10% of respondents stated that they were providing public access to digitised content during the lockdown. It is therefore clear that archive services will need support to accelerate the development of their digital presence to withstand the effects of COVID-19. Otherwise archives services will face the genuine risk of losing their relevance to the communities they serve, which could influence the extent to which funding is allocated to archive services and possibly determine whether finances are withdrawn entirely in the context of managing widespread and deep economic pressures.

### **Full submission: Impact of COVID-19 on the archive sector**

#### **Introduction to The National Archives**

9. The National Archives is a non-ministerial government department and arm's length body of the Department for Digital, Culture, Media and Sport (DCMS), funded directly by HM Treasury. The National Archives is the official archive and publisher for the UK Government and for England and Wales, and has statutory responsibility for public records held by archive services in Wales, in collaboration with the Welsh Government. The National Archives also performs the Historical Manuscripts Commission's functions in relation to records in private ownership. The Chief Executive Officer of The National Archives, Jeff James, holds the role of Keeper of Public Records, by appointment of the Secretary of State for Digital, Culture, Media and Sport and, by Royal Warrant, is appointed Historical Manuscripts Commissioner (see annex: section D). The Chief Executive of The National Archives also holds the offices of Queen's Printer of Acts of Parliament, Queen's Printer for Scotland and also appointed as the Government Printer for Northern Ireland and Controller of Her

Majesty's Stationery Office (HMSO).

10. The National Archives has leadership responsibility for the wider archive sector in England (over 2,500 archive institutions) including over 200 Places of Deposit. In this role, we provide strategic leadership, guidance, develop standards and share best practice in archive management. Under the provisions of the Public Records Act 1958, we supervise and appoint Places of Deposits to hold and receive public records of historical value for permanent preservation. Public records are created by government departments, courts of England and Wales, armed forces and includes some non-departmental public bodies, committees, commissions, and their boards of enquiry (see annex: section B). Archival collections, particularly those held by Places of Deposits, are therefore essential resources and levers for applying scrutiny and for ensuring the accountability of decisions made by government agencies and authorities.

### **Reasons for submitting evidence**

11. Our reasons for presenting this submission are twofold. Firstly, The National Archive's sector leadership functions puts the organisation in a strong position to comment on the impact of COVID-19 on archives in England. Secondly, we want to highlight the risk to archival heritage and the ramifications for the delivery of public tasks, information legislation and accountability.

#### The National Archives' sector leadership role

12. Central to the mission of The National Archives is its strategic leadership role over the archive sector. We support the sector to ensure that the public record and the wider archival heritage of the nation are preserved and made accessible, through the delivery of the Government's vision for archive services, *Archives Unlocked* (see annex: section E). Our sector leadership role is largely defined by the provision of guidance, advice and support to archive services, rooted in the expertise and authority we hold as a lead practitioner in the field. It is important to emphasise that our sector leadership role is not constituted on a funding model, as we do not have sector investment functions.
13. As a lead practitioner in the archive sector, both nationally and internationally, this qualifies us further to comment on the impact of COVID-19 on knowledge and information management and the archive sector. We have worked in partnership across sectors internationally to promote and support the documentation and preservation of the pandemic, notably through our membership of the International Council of Archives (ICA) and the Keeper's role as Chair of the Forum of National Archivists.
14. In response to COVID-19, we have been running information-gathering webinars and surveys, which are providing us with a comprehensive understanding of how archive services have changed and responded during the pandemic. These activities, alongside our extensive professional networks, have meant that since the outbreak we have gathered information on the immediate and longer-term impact of COVID-19 on archival heritage, people and archive services. We welcome the opportunity to share these insights and sector intelligence with the committee.

#### Risk to archival heritage

15. This submission coincides and complements our advisory functions to UK government departments and public bodies in England on their duties regarding information management during the pandemic. Protecting archival heritage during a crisis is essential because the preservation of and access to archival collections ensures that the government will remain accountable for emergency measures and for the unprecedented interventions taken during this time.
16. The overall effect of COVID-19 on the sector is the increased risk to archival collections. The nation's archival heritage is held by a highly diverse range of custodians, including national institutions, local authorities, universities, libraries, museums, businesses, charities and private and specialist institutions. The diversity in the composition of the archive sector means it is notably distinct to other cultural and heritage sectors, with archives operating across a variety of business and organisational models. Furthermore, it is common for archives to be held by organisations where culture and heritage are not their core business or activities. This diversity has generally been a strength, evident in the richness and variety of collections across the country. However, during the COVID-19 pandemic, this diversity has led to an elevated exposure to a wider range of risks, often varying according to

differences in organisational models. The resilience of archives is often further compromised as they are frequently a small body/function of a wider organisation. Consequently, in situations where archives fall outside its organisation's core functions, archives can easily be overlooked.

17. The contraction of the economy generated by the pandemic has resulted in a significant increase in the vulnerability of custodians of archives to financial collapse. Since the pandemic, interventions have been required more frequently. We are aware that financial pressures on local authorities compounded by COVID-19, could adversely affect the funding of their archive services and thus restrict the resources required to fulfil Archive Service Accreditation standards, relating to the preservation and security of collections. In the short-term, risks to collections are becoming more pressing due to archive staff being furloughed or redeployed, which has led to the curtailing of routine collection care and management activities at some sites.

### **How effectively has the support provided by DCMS, other Government departments and arms-length bodies addressed the sector's needs?**

18. The archive sector does not have a centralised funding body, from which to receive substantial grant funding to address archives-specific issues. Therefore, the financial assistance available to archive services, to support crisis management and resilience and how they access this, has varied significantly across the sector.
19. The National Lottery Heritage Emergency Fund has provided an avenue of financial support for not-for profit organisations holding archives seeking emergency funds, up to £250,000, to stabilise operations and manage unforeseen risks during the COVID-19 pandemic. This fund, which is open to heritage organisations, has given an opportunity for archives to apply for support to respond to these unprecedented pressures. While this support is offering valuable assistance to some archives, the reach of the package is somewhat limited because during these times of unprecedented need, the fund is highly competitive and furthermore, eligibility is restricted to former and current grant holders.
20. In May of this year, we surveyed the sector on the impact of COVID-19. The results showed that the Coronavirus Job Retention Scheme (CJRS) has been accessed by a significant proportion of the archives services. This scheme has been particularly important for the sector because the technical skills and knowledge of archive staff, means that their roles cannot be easily filled at short notice, once operations are resumed.
21. The National Archives, through *Archives Unlocked*, the government's vision for the sector, dispenses small-scale funding and administers a range of targeted initiatives focussed on skills, cataloguing, innovation and collaborative working. This support to archive services continues during the pandemic, however the funding programme is not at the scale that can be expected to meet the urgent and complex pressures prompted by COVID-19. We are working closely with the Archives and Records Association (ARA), Business Archives Council (BAC) and the UK Crisis Management Team (CMT) in monitoring developments and on providing extensive guidance to the sector. During the closures, we have published advice on supporting the workforce, on maintaining basic services and on managing risks to collections. As lockdown measures are lifted, we are providing archive services with updated guidance on resuming on-site operations safely. As part of our advisory offer to archive services, we have contributed funding towards a joint initiative with ARA to launch the COVID-19 Support Hub that is providing reliable guidance from official sources and the wider heritage sector during these uncertain and unprecedented circumstances.

### **What has been the immediate impact of COVID-19 on the sector?**

#### **Archival Heritage**

##### Risk to national heritage: vulnerability of archive services to financial collapse

22. The nation's archival heritage is cared for by a highly diverse range of custodians. These include businesses, charities and arts organisations many of which are now significantly more vulnerable to failure and dissolution as a result of the COVID-19 pandemic and consequent financial pressures. We know from experience that important irreplaceable collections of national and local value may be lost

or destroyed if and/or when their custodians fail, creating significant gaps in our national memory. This loss has important ramifications for the future, because it will affect the ability for future generations to research past events and to scrutinize the interventions of decision-makers.

23. Prior to the 23 March 2020 and the introduction of emergency measures to restrict the spread of COVID-19, certain business archives were known to be at risk and work was underway to protect and preserve these collections (for example, Beales department store). Since then we have seen a dramatic rise in collections that are at risk owing to financial failure and potential dissolution. This includes, but is not limited to the archive collections at Ede & Ravenscroft Ltd, TUI, Laura Ashley Ltd, Flybe Ltd and Remnant Kings.
24. The [UK Crisis Management Team](#) is a voluntary cross-sector group, which coordinates efforts to identify and preserve business records, in cases of liquidations, administrations, takeovers and other circumstances where records may be in danger and to broker new homes for them. Recent successes include the placement of the archives of Comet Group PLC at the Hull History Centre and the transfer of the historic Thomas Cook Group PLC archive to Leicestershire Record Office. There are also instances where it has not been possible to gain traction with liquidators, and important corporate archives, such as those of the Bank of Credit and Commerce International (BCCI), have been irretrievably lost.
25. Unfortunately, the remit of the Crisis Management Team does not extend beyond business archives to encompass archival collections held within charitable and voluntary bodies, third sector and non-profit organisations, but in parallel with The National Archives, it monitors and supports where possible. In addition, the Crisis Management Team is not supported by funding.
26. For the longer term impacts and support required, see paragraph 50.

#### Role of archives in documenting the pandemic

27. The archive sector and the Knowledge and Information Management (KIM) profession are critical in documenting, securing and preserving records relating to the COVID-19 pandemic, which will enable not only business continuity, research and innovation, but also evidence of how this crisis was managed for future generations. Archives are the custodians of the 1918 influenza pandemic records, which are being studied by scientists around the world and these institutions will eventually be the stewards for records related to the COVID-19 pandemic.
28. The importance of records management, especially in times of crisis, is currently being highlighted across the sector. Notably, a joint statement on the duty to document COVID-19, was issued by the International Council on Archives (ICA) and the International Conference of Information Commissioners (ICIC). In the Keeper's role as Chair of the Forum of National Archivists and our Head of Policy's role as Chair of the ICA Expert Group on Legal Matters, we assisted in the development of the statement. The statement is founded on three principles: 1) decisions must be documented, 2) records and data should be secured and preserved in all sectors, 3) security, preservation, and access to digital content should be facilitated during the lockdown.
29. Reinforcement of the importance of archives and their unique role in the COVID-19 pandemic is vital, alongside the promotion and support for good information management. However, documenting and preserving the records from the COVID-19 pandemic is especially challenging, due to the increasing complexity of digital records, such as algorithms, rough or raw data, extensive web and social media archiving and the varying capability of archives to capture this complex information.
30. Through the [UK government web archive](#) we are maintaining a comprehensive record of coronavirus information published by the UK government on the internet, through high intensity web archiving of GOV.UK and NHS.UK, government social media channels and other government websites. In April 2020 alone, this involved an additional 191 full captures, crawling 18 million URLs gathering 2.7TB of data. We also archived 25GB of hard to capture content, including the source code of the COVID-19 app and daily captures of the [government data dashboard](#).
31. In addition, as the Queen's Printer and the Controller of Her Majesty's Stationery Office (HMSO),

with responsibility for [legislation.gov.uk](https://www.legislation.gov.uk), we have supported government in enabling legal certainty, seven days a week with the registration and publication of emergency legislation, capturing the evolution of existing legislation. Finally, as a result of the Coronavirus Act 2020, we have the additional responsibility for publishing notice of steps taken by public authorities, for judicial notice, as well as for evidential and record keeping purposes in [The Gazette](#), the newspaper of record.

## People

### Changes to the workforce: Furloughed, remote and redeployed workers

32. Based on the findings of our initial impact survey of the sector, the majority of the workforce are working at home (67%) completing collections management tasks (e.g. cataloguing using scanned documents, transcribing and retro-conversion of catalogues) and continuing to engage with their audiences. Utilisation of the Coronavirus Job Retention Scheme (CJRS) is especially prevalent in organisations, which are dependent on income generated by visitors. Finally, our survey showed that 12% of the workforce have been re-deployed mainly within local authorities.
33. We expect that staffing arrangements will become a major issue for the sector, as a result of further furloughing, re-deployment, possible elimination of posts or staff having been advised to shield or self-isolate. As archives teams are often very small, any instances of self-isolation or illness will likely have a big effect on service management.
34. For many organisations recruitment has been frozen, which is likely to hinder the delivery of ongoing and future projects.

### Recognition of essential collection care operatives as key workers

35. Across archive services there have been different approaches to categorising staff as key workers. Only a small number of archive staff have been attributed key worker status by the parent organisation and issued with documentation to this effect. However, there has been a tendency for organisations to retain archive staff with records management and information governance responsibilities, or who are involved in major projects, such as the development of new facilities. Nevertheless, the situation continues to change rapidly and there remains a high degree of uncertainty around current and future staffing arrangements.

### Changes to volunteer workforce composition, shift to remote volunteering

36. Volunteer activity has largely ceased across the sector, unless it is being managed remotely. From our own experience we have seen an increase in the remote volunteer workforce during the lockdown and we would expect a similar trend across the rest of the archive sector. For example, following a social media campaign to recruit volunteers for our [Royal Navy project](#), during the first five weeks of lockdown we had 470 new remote volunteers. Prior to the closure we would only expect 5 to 10 enquiries per week.

## Services

### Temporary physical closure of the majority of archives: restricted access for public, depositors and parent organisations

37. Physical archival collections managed by public sector bodies or held by private institutions have been largely inaccessible since the introduction of government guidelines on the control of the COVID-19 pandemic. Between 17 and 20 March 2020, most archives, museums and libraries closed to the public, severely reducing access to physical collections, for both the public and staff. Restricted access to physical collections, has limited the ability for archive services to carry out key public functions, including answering enquires and managing statutory services in relation to Freedom of Information requests.
38. In addition, with the temporary closure of archival buildings almost all local authority Places of Deposit have been unable to accept new acquisitions under the Public Records Act 1958, which in turn, will likely hamper the UK Government's policy goal in realising the transition to the 20-year rule by 2025 for records of local interest. For the longer term impacts on the delivery of the 20-year rule for records of local interest, see paragraph 65.

#### Digital presence and access to digital collections

39. Based on the results of our initial impact survey of the sector, the ability to access collections remotely remains low, with limited access to digital content and little alterations to archive services' digital offer. 22% of respondents to our survey, have been able to provide an enquiry service, although the ability to respond has been impacted by the lack of access to original documents, with the majority relying on online catalogues or digitised content. Two respondents have confirmed that their enquiry services has been suspended.
40. From the survey of 203 archive services, only 21 (10%) organisations stated that they were able to provide access to digital content, either through their own website and/or through third parties, like Ancestry or FindMyPast. The charging model for access to digital collections remains varied, with 2% of respondents stating that a paywall was in place. For others the provision of free access to content on Ancestry and/or FindMyPast, was available, albeit mainly in collaboration through their library service.
41. In response to our temporary closure, The National Archives is providing free online access to a wide range of our digital and digitised records through our [Digital Downloads Service](#) to meet our duties under the Public Records Act 1958 to provide access to our collections. This initiative has seen our digital services running at an all-time high and in the first two weeks of the free service, there were 252,674 downloads (up 2,246%) with 96,146 new accounts. In addition to our Digital Downloads Service, much of our name-rich family history content is already available online through our commercial partners.
42. Throughout the sector, the public presence of archives has however been uneven, which has highlighted the wide range of archive services within the sector and the importance of their institutional setting, where capacity and level of preparedness is variable. For example, our survey indicated that there are cases where archive services do not possess an online catalogue, rendering access to archival collections severely limited.
43. Across the sector, archive services have continued to engage with existing audiences, whilst trying to reach new audiences through the use of social media and online engagement (blogs, exhibitions and podcasts). However, the uptake of social media was relatively low with only 38% of our survey respondents using social media channels (including Twitter, Facebook, Instagram, YouTube) to engage with audiences.

#### Delivery of public tasks and information legislation

44. Across the sector there has been a significant impact on archive services' ability to maintain public tasks, albeit the picture across the sector remains varied. Archive services are very mindful of their obligations under information legislation, including the handling of Freedom of Information requests; but the current circumstances around COVID-19 means there is a difficulty in meeting the timescales set by the legislation.
45. We, at The National Archives, are continuing to process Freedom of Information requests, as per our statutory obligations, through a mixture of restricted access to our onsite collections and remote working. However, for some archives, due to furloughing and redeployment, processing Freedom of Information requests has been severely limited. In these instances, we are aware of temporary measures that have been implemented to ensure a service is still provided, albeit limited. For example, the redirecting of emails to staff in compliance or legal teams. In instances where archival staff have not been furloughed, staff are responding to enquiries, although again are impacted by the lack of access to the physical collections.
46. Finally, we are also aware of archive services that are able to provide a service in supporting public inquiries and carrying out official tasks. For example, the retrieval of case files for the local coroner. In our role in supporting public inquests, inquiries and investigations, we are providing a scaled-down service to allow access to physical records where this can be achieved safely, and for meeting the needs of government departments that require access to records for pandemic research and planning, for example, civil service contingency plans.

## **What will the likely long-term impacts of COVID-19 be on the sector, and what support is needed to deal with those?**

### **Revenue, funding and financial models**

47. Throughout the sector there has been a dramatic decline in opportunities to generate income. From our initial impact survey the majority (78% - 156 organisations) are expecting a general reduction in internal and external revenue and funding. Loss of revenue is expected in, but not limited to, reprographic sales, fees (including licensing), events, research fees and venue hire.
48. It is important to note that the archive services that had most successfully diversified income streams away from a reliance on core funding, have been among the most immediately affected by COVID-19. The heavy reliance on footfall and a physical presence to generate income will likely trigger a review of financial models, with more archive services seeking ways to diversify their income streams. For local authorities, there is an increased risk of reduced funding for archive services with the additional strain of COVID-19 related financial pressures.
49. There is no central body responsible for crisis and resilience funding for the archive sector, and there is general apprehension and overarching concern that the sector could be unintentionally overlooked. For example, the sector is not eligible to apply for funding from Arts Council England and the National Lottery Heritage Fund (NLHF) Heritage Emergency Fund is highly competitive and only open to current and previous grant holders. Before the pandemic NLHF awarded financial support to archive services for longer term projects, however, new awards have been temporarily suspended, with the funds diverted to the Heritage Emergency Fund. There is likely to be a longer-term impact if NLHF continues to divert funding away from the usual programmes, on which archives services rely heavily. If this move towards short-term emergency funding is replicated by other organisations and development agencies, this could lead to a more limited availability of project funding.

### **Archival Heritage**

#### Risk of dissolution, threats to services and collections

50. As highlighted earlier, the entire archive sector is more vulnerable to failure and dissolution as a result of the COVID-19 pandemic. This vulnerability is likely to continue to grow throughout the pandemic and into the period of relaxation of restrictions. Archival collections could be at risk if the custodians are no longer financially viable, threatening the loss and/or destruction of irreplaceable collections.
51. We are aware of a number of business (for example Ede & Ravenscroft Ltd, TUI, Laura Ashley Ltd, Flybe Ltd, and Remnant Kings) and charity archives that have been put at risk due to the COVID-19 pandemic. In addition, there are concerns about the future of archival collections held by organisations that may fail financially as a consequence of prolonged closure to the public (e.g. small independent museums).
52. As organisations retrench to survive there is a concern that archival staff or the collection itself may be reduced, particularly when the Government's Coronavirus Job Retention Scheme is withdrawn, and redundancies become a greater possibility. In the longer term, there are also concerns about larger, national heritage and culture organisations, which may consider a reduction in resources for archives, leading to possible adverse effects on staffing and service delivery in the near future.
53. The UK Crisis Management Team are monitoring the news and contacting administrators and insolvency practitioners where necessary to help ensure business archives are not lost over the next few months. However, one of the key risks arises from the fact that the preservation of archival heritage is rarely a priority for insolvency practitioners. We are aware that the Minister of State for Media and Data (DCMS) has written to Minister for Climate Change and Corporate Responsibility (BEIS) to promote the importance of the preservation and integrity of archives to the Insolvency Profession. We have begun an open dialogue with officials at BEIS and at Insolvency Agencies.
54. Whilst the Crisis Management Team is highly effective, it is small, reliant on volunteers and does not



receive funding. Further resources allowing for the rapid expansion of the Crisis Management Team, both in terms of size and potential speed of response, would help to ensure we are able to act in a timely way and at scale to ensure the preservation of our heritage, where possible.

55. Furthermore, whilst the remit of the Crisis Management Team does not extend beyond business archives, the Records at Risk Group (unfunded advisory body of representatives from the academic and archive sector, working with The National Archives) focuses on protecting collections which are unprotected by legislation, particularly archives services created by businesses, individuals and voluntary organisations. However, we foresee that additional support and intervention is likely to be required, notably in cases involving the rehoming of collections.

## People

### Workforce: Reduction in onsite volunteers

56. Despite the boom in remote volunteering, following the relaxation on current restrictions and the re-opening of archives, there may be a decline in the onsite volunteer workforce, which heavily supports the archival sector. The decline is anticipated owing to limitations on travel, extended social distancing and public attitudes. Furthermore, the general demographic of volunteers at archives services tend to be older adults, who may be advised to follow tighter social distancing restrictions, owing to their vulnerability to COVID-19.

### Engagement with existing audiences

57. Following the re-opening of archive services, the demand for onsite services are likely to be dramatically reduced, owing to significant barriers associated with logistics and lower levels of public confidence in visiting public spaces. This, in turn, will impact on revenue and the financial viability of the sector.
58. This cautious attitude to visiting public spaces is more likely to be pronounced in the archive sector due to the typical demographic of archives service users, who tend to fall into the more vulnerable categories. From our data, the majority of users of archive services are retired and aged 65 or over. In addition, around 17% of our researchers have a long-term impairment or disability (most commonly hearing or mobility issues). Additionally, there is likely to be an adverse effect on the footfall of underrepresented groups, i.e. BAME and people with disabilities, because of either higher vulnerabilities or increased barriers caused by COVID-19.
59. The locality of archive services and transportation options will also likely impact on footfall. For example, 67% of visitors to The National Archives use public transport to reach us. We therefore expect that we will experience a period of reduced footfall from people who are dependent on public transport due to risk of infection, coupled with the high degree of unease currently felt by the public about using public transport. Furthermore, around 1 in 5 visitors to The National Archives are from overseas which will likely further suppress footfall due to the global decline in overseas travel. In addition, it is worth noting, that onsite educational services offered by archive services are likely to be impacted, due to the likely reduction in school trips.
60. For archives services to continue to be accessible, relevant and viable, it is essential for the sector to adopt new service models for engagement with a greater focus on their digital offer, rather than traditional footfall.

## Services

### Increase in demand and expectation to access collections and content digitally

61. The COVID-19 pandemic has already prompted an observable shift to online demand and engagement. To maintain their relevance and viability, archive services will need to adopt new models of service delivery, enhance existing programmes aimed at online engagement and become increasingly digital by design. This includes increased digitisation of their physical collections, the availability of enhanced online cataloguing of their holdings and the ability to provide effective online/remote advice and support to their users, including in their educational offer.

62. However, the digital presence and capability of archive services across the sector remains uneven and COVID-19 potentially risks exposing organisations, which are not yet as digitally mature as *Archives Unlocked* aspires to be. For the professional community of archivists this is a time of great uncertainty and strain, with the development of new models of service delivery likely to require investment in new digital capabilities and potentially in onsite infrastructure.
63. In December 2019, we launched [Plugged In, Powered Up](#), a comprehensive strategy of programmes, training and resources to support archives and address the gaps in vital digital skills. This includes the delivery of a free ‘Archives School’ to train digital archivists and the creation of a new online learning resource, [Novice to Know-How](#) for practitioners, in collaboration with the Digital Preservation Coalition. In addition, our [Collaborate and Innovate](#) funding programme supports the drive towards innovative practice, the development of new ideas, and collaborative approaches to problem solving. The funding programme consists of two schemes: the [Archive Testbed fund](#) and the [Networks for Change fund](#).
64. Whilst we are working with the sector to increase digital capability and build resilience, our current programmes on offer are not presently at a scale to cope with a dramatic increase in demand. However, we aspire to enhance the professional skills of archivists and to equip them to deliver services during and after the lockdown. We are looking to deliver accelerated and scaled-up versions of our current professional skills training offer, as set out in the ‘Plugged in, Powered Up’ strategy, which includes digital skills training. The development of digital skills and capability will be essential as archives reimagine how they deliver their services to the public, post pandemic.

#### Delivery of the 20-year rule for records of local interest

65. Under the [Public Records Act 1958](#), specified local offices of public sector organisations (magistrates’ courts, prisons, coroners’ courts, NHS bodies and some arms-length bodies including the Environment Agency) are required to transfer [public records](#) of historical value for permanent preservation to local archive services appointed as ‘Places of Deposit’. From the 1<sup>st</sup> January 2015, changes in [legislation](#) meant that specified local offices of public sector organisations must now transfer records selected for permanent preservation to a Place of Deposit at 20-years after their creation, rather than the previous 30-years.
66. Since early March 2020 almost all local authority Places of Deposit have been unable to accept new acquisitions under the 20-year rule for records of local interest. In addition, with the majority of public record bodies working remotely and with restricted access to archival collections, the ability to carry out key tasks (including appraisal and selection, and sensitivity review) to facilitate the transfer of new acquisitions will be hindered, which will further delay the public’s access to public records. This is likely to hamper the UK Government’s policy goal in realising the transition to the 20-year rule by 2025 for records of local interest.
67. In our role in providing support and guidance under the Public Records Act 1958, we have issued advice to public record bodies and to Places of Deposit that we are not expecting the transfer of public records, until further notice, when it is deemed safe and practical to do so. This is in line with our decision to suspend transfers until further notice.
68. Each year we also distribute a [New Burdens Fund](#) to cover the increased activity for local authority Places of Deposit during the ten-year transition period. Funding is allocated proportionally based on the volume of eligible public records transferred to Places of Deposit in the past calendar year. It is possible to allocate New Burdens payments for transfers in 2019-2020; however, the uncertainty about the transfer of new acquisitions during this year, will impact on the New Burdens allocation for 2020-2021, which in turn could affect Places of Deposit budget planning and spending. In due course, we will assess the situation and put a plan in place to address the impact on the allocation of the New Burdens Fund for 2020-2021.

#### Places of Deposit and Archive Service Accreditation

69. Under the Public Records Act 1958, Places of Deposit are required to provide suitable facilities for the safeguarding, preservation and public accessibility to public records. To qualify for Place of Deposit status, archive services are expected to achieve [Archive Service Accreditation](#) (see annex: section F),

which provides assurance that the necessary standards are being maintained.

70. As of the middle of May 2020, out of the 2,500+ archive services across the UK, 162 (6.5%) have achieved Archive Service Accreditation. However, due to financial pressures and shifting priorities as a result of the COVID-19 pandemic, there is likely to be a long-term impact on archives services, including Places of Deposits, ability to comply and maintain with the sector standards for archival accreditation. This in turn could affect compliance with statutory obligations under the Public Records Act 1958, in the safeguarding, preservation and public accessibility of public records at Places of Deposit.
71. In the case of local authority Places of Deposit, while day-to-day responsibility is delegated to the Keeper, the Secretary of State still maintains the responsibility to intervene to safeguard public records at risk if a Place of Deposit were to fall into serious difficulties, which may be beyond our capacity to resolve on our own.
72. To support the sector, the Archives Service Accreditation partners and governing committee recognises that the current circumstances are exceptional and that reduced services due to the pandemic will not affect accreditation status. However, the relaxation of Archives Services Accreditation is only temporary, and we will continue to monitor and support the sector. In addition, we have provided advice and guidance on managing risks associated with closure, maintaining basic services and preparing to reopen, to ensure archives are in position to recover and resume operations safely and successfully.

#### Implementing COVID-Secure Guidelines

73. Implementing and ensuring a COVID-Secure archive will impact on service delivery. At present, the level of impact and alterations to services remains unknown, with outstanding questions that need to be addressed by the sector. However, following social distancing guidance, we anticipate reduced opening hours and increased restrictions on access (e.g. introducing the pre-booking of documents and seating) for many archive services, which are able to re-open. We also recognise that services may experience a continuing reduction in staff resources or need to support the priorities of their own organisation, which could have an impact on the ability of archive staff to carry out the full range of core functions.
74. In addition, due to social distancing and the need for greater space, we are aware of several local authorities who are occupying archival spaces for the delivery of other public tasks, which in turn will impact on the ability of archives to resume onsite services for the public.
75. In our role, as sector leaders we have issued [principles and operational factors](#) that an archive service should take into account when planning for its re-opening. We will continue to engage with the sector, to support archive services and the preservation of their collections, and to address the inevitable challenges of survival and resilience, which will be critical in the coming months.

## **Annex 1.**

### **A. Public Records Act 1958**

The Public Records Act 1958 provides the statutory framework of the public records system in the UK, and works with other legislation to regulate record management and access for Her Majesty's Government. The Act gave provision for the Public Records Office, now The National Archives, which holds the official record of UK Government. Among other things, the Act defines what a public record is, how records should be managed, and which bodies should be subject to the Act.

### **B. Definition of a public record under the Public Records Act 1958**

A public record is defined by the Act as 'the administrative and departmental records belonging to Her Majesty'; records created or held by any government department, commission, office, or other body created by Her Majesty's Government. The Act is format neutral, allowing for any item or technology that conveys information to be considered a record. Records created by devolved administrations, local authorities and other types of government organisations are not UK public records, and are subject to other information management criteria.

### **C. Places of Deposit**

Places of Deposit fall into three distinct categories, firstly local records offices (usually metropolitan borough, unitary or county archive services), secondly, specialist (for example university or military archives) or thirdly, government (for example research establishments or national museums). Places of Deposit for public records are appointed to hold specific record classes in agreement with their parent authority under Section 4 (1) of the Public Records Act (1958). The most typical reasons for such an appointment are that the records are of strong local interest and are best made available within the context of a local archive service, or that the records are retained by their creating institution as the most appropriate location for ongoing use. The National Archives appoints Places of Deposit after inspection to ensure suitable arrangements are in place for the preservation of and access to the records. We use the Archive Service Accreditation Programme to ensure that standards are being maintained by Places of Deposit.

### **D. Delegation of responsibilities to the Chief Executive of The National Archives and Keeper of Public Records**

The Chief Executive of The National Archives, in their role as Keeper of Public Records, exercises a number of duties for the archive sector on behalf of the Secretary of State, covered by the provisions of the Public Records Act 1958, in relation to supervision of the Place of Deposit system. These duties include appointing Places of Deposit, approving the transfer of public records from The National Archives to a Place of Deposit or from a Place of Deposit to The National Archives, or another Place of Deposit. As part of the delegation of responsibilities, the Keeper through The National Archives, provides guidance and supervision to public record bodies on the safekeeping and selection of public records.

In 2003, The Chief Executive of The National Archives and Keeper of Public Records, acquired the additional role of Historical Manuscripts Commissioner, when the Historical Manuscripts Commission joined with the Public Records Office to become The National Archives. The transfer of the Historical Manuscripts Commission (HMC) to The National Archives constitutes a significant aspect of our sector leadership role. The HMC, since its inception, has documented the location of records and papers in private ownership, however, in 1959 their mandate included anything that was not classified as a public record under the Public Records Act 1958. The location of these records are documented through our catalogue Discovery, which has incorporated previous databases and registers. Under our HMC functions, we provide advice on managing and caring for archives, and working with partners across the archive sector to develop new opportunities for archives to connect and improve. We also monitor the sale and export of archival material and secure significant archives from the risk of dispersal and neglect, including through our cultural property advice to the HMRC Acceptance in Lieu and Conditional Exemption schemes.

### **E. Archives Unlocked**

Launched in March 2017, *Archives Unlocked* is the Government's strategic vision for the archives sector which

focuses on the needs and potential of the sector, and realises in practical and tangible terms their unique relevance in preserving the diversity of our nation's heritage. At the centre of *Archives Unlocked* are the following ambitions:

- Trust: people and institutions trust in the authenticity of archive records and how they are preserved and presented
- Enrichment: archives enhance and enrich our society intellectually, culturally and economically
- Openness: archives cultivate an open approach to knowledge and are accessible to all

Underpinning these ambitions is an annual action plan, which outlines how we are working to make the vision of *Archives Unlocked* a reality. Both the vision and the accompanying action plans are the result of extensive consultation and development work with the archives sector, our partners and beyond. It sets out how the archives sector needs to address a range of opportunities and challenges – developing digital capacity, building resilience and helping the sector demonstrate the impacts that archives have on society.

#### **F. Archive Service Accreditation**

Archive Service Accreditation is the UK-wide standard for archive services. It is a national benchmark and quality standard, which recognises good performance across three important areas: organisational health, collections management and access. Archive Service Accreditation is a partnership of seven organisations: the Archives and Records Association (UK); Archives and Records Council Wales; National Records of Scotland; Public Record Office of Northern Ireland; Scottish Council on Archives; The National Archives and the Welsh Government through its Museums, Archives and Libraries Wales division.

#### **G. The National Archives' COVID-19 Sector Survey**

During April 2020, The National Archives conducted a survey into the impact of COVID-19 pandemic on the wider archive sector. The main purpose of the survey was to capture a national picture of the impact of the disruption to archive services. We received 203 responses, from across England, Scotland and Wales, which encompassed a cross section of the various custodians of archival collections. The largest share of responses were received from local authorities (35%) and the Higher Education sector (17%).