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Feasibility Study for a National Archive for Wales

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Foreword

At present Wales does not have a dedicated national archive, and I must acknowledge the excellent work done by The National Archives in Kew in providing for the Welsh public record. It is however timely to consider whether the establishment of a National Archive for Wales is now an appropriate step for us to take as a devolved nation.

A national archive plays a crucial role in preserving a nation's history and collective memory, documenting and preserving evidence of the decisions of government and public bodies, and recording the rights and responsibilities of citizens. A national archive safeguards these unique and irreplaceable records, provides access for citizens enabling them to challenge and hold decision makers to account, and provides government with a record of past decisions to inform and support current policy development and decisions.

In 2018/19 the Welsh Government therefore made a commitment to undertake a feasibility study for a National Archive for Wales. I welcome this report which presents the findings of the initial study, and provides a starting point for a national discussion.

I have asked my officials to continue to develop our understanding of what would be required to deliver a National Archive for Wales, and look forward to engaging with stakeholders at all levels as this work proceeds.

Yr Arglwydd Elis-Thomas AM
Deputy Minister for Culture, Sport and Tourism

Executive Summary

The Public Record

Public records are defined under the Public Records Act 1958 as records belonging to Her Majesty, in particular records of government departments or offices, but extending to records such as those of the NHS and armed forces. They are fundamental to society as they are the definitive primary record of the process, decisions and actions of central government and other public institutions.

'Welsh Public Records', which include the records of the Welsh Government, are separately defined by the Government of Wales Act 2006, but currently fall under the remit of The National Archives (TNA) in accordance with the Public Records Act 1958.

Caring for public records requires that the following characteristics are assured:

- Authenticity – it is what it purports to be
- Reliability – it comprises an accurate representation of what it documents
- Integrity – it provides a coherent and complete record of what is documented, and is safeguarded against loss or corruption
- Usability – it is accessible and in a usable condition

Given the scale of public recordkeeping, the complexity of record creation, and the mix of digital and analogue records that comprise today's public record, keeping and caring for this unique resource requires a sophisticated, professional, sustainably resourced approach.

A National Archive for Wales

Wales is the only UK devolved administration which does not have a dedicated national archive. These functions are currently provided for by The National Archives (TNA), based at Kew, which acts as the national archive for England, Wales and the United Kingdom. It works in accordance with the Public Records Act 1958 to identify, preserve and make accessible the public record.

The Government of Wales Act 2006 makes provision for the transfer of responsibility for Welsh Public Records to the Welsh Ministers via Ministerial Order. The Assembly would then need to approve its own public records legislation to establish a National Archive for Wales or Public Record Office, dependent on the scope of its responsibilities and functions.

This legislation would, at a minimum need to consider:

- the definition of Welsh Public Records and whether this needs to be extended to ensure a coherent and complete national record;
- the extent of functions relating to guidance and supervision of public record bodies regarding the management of their records;
- the extent of functions relating to the collection and safeguarding of non-public records of national value;
- the extent of functions relating to leadership and supervision of the archive sector in Wales;
- the organisation(s) that would take responsibility for the preservation and accessibility of Welsh Public Records and delivery of associated functions.

As the National Archive for Wales any new body would be required to meet relevant standards for professional practice and quality of service delivery, demonstrating equivalency of provision with other UK home nations. The development of this body will represent a significant additional investment on the part of the Welsh Government; under current arrangements national archive services are provided by TNA free of charge.

The Digital Challenge

There is a tendency to view the establishment of a national archive in terms of the building it occupies and the physical records in its care. The vast majority of modern records are however created digitally, and managing the digital public record will be the primary function of any new National Archive for Wales.

The digital record is however fundamentally vulnerable to a range of integral technological issues, and external cyber-threats. It needs careful continuous management from the point of creation onwards to ensure not only its survival, but its authenticity, reliability, integrity and usability.

Providing preservation and access to the national born digital record is complex, challenging and resource-intensive. Any consideration of establishing a National Archive for Wales *must* seriously contemplate the creation and maintenance of a robust digital preservation system, and investment in research, specialist expertise and technology. At present, no organisation in Wales has the knowledge or capability to manage digital records at the scale required.

Inadequate system provision risks loss of critical information, non-compliance with information legislation, and severe reputational damage to Wales.

Potential Models

The establishment of a National Archive for Wales would be a major financial undertaking¹. The National Archives (TNA) currently provides for the management of Welsh Public Records at no charge to the Welsh Government.

This report has considered five models for the delivery of national archive functions in Wales; the benefits and potential drawbacks of these models are summarised below:

Model 1: Augmenting existing arrangements TNA would continue to act as the national archive service for the United Kingdom, England and Wales, with additional dedicated services focused on Wales.

Strengths

- This is the quickest solution to the delivery of national archive functions for Wales, with the lowest risk and cost
- No disruption, uncertainty or expense from establishing a new institution
- Management of the Welsh public record provided at no cost to the Welsh Government
- Continued benefits of TNA's expert knowledge and practice
- New digital services could widen access with a Welsh focus

Weaknesses

- Welsh records would be preserved by a London-based institution (albeit with an English and Welsh remit and wider UK role); no physical services would be delivered in Wales
- Does not provide the cultural focus or identity of a Welsh national institution; Wales would remain the only UK home nation without a distinct national archive
- Could create artificial divisions between 'UK' and 'Welsh' records which hinder access and understanding
- New digital services would widen access with a Welsh focus, but at an *additional cost* to the Welsh Government; development of these services could be complex and expensive
- No additional benefits to the wider archive sector in Wales

¹ Indicative costs suggest that the capital investment required in a building would be in the order of £15-20 million; the digital preservation function would require investment of at least £9 million over each 5 years of operation; and the new body would require revenue funding of between £2.1 and £7.5 million p.a. (See Appendix 3).

Model 2: A Welsh Public Record Office Responsible for Welsh Government records, and those of 'Welsh public record' bodies.

Strengths:

- Provides the cultural focus / identity of a Welsh national institution; a degree of parity with other UK home nations; physical services would be delivered within Wales

Weaknesses:

- Limited option, which requires legislative change, and significant investment, but without delivering wider benefits for Wales documentary heritage / the wider archive sector
- Prosaic nature of collections (modern records) unlikely to capture public imagination

Model 3: A National Archive – oversight of public sector recordkeeping; archive sector leadership A National Archive for Wales with responsibilities focused on collection, management and access to Welsh public records, statutory powers to oversee recordkeeping in local authorities, and a leadership role for the wider archive sector.

Strengths:

- Provides the cultural focus / identity of a Welsh national institution; increases parity with other UK home nations; physical services would be delivered within Wales
- Assists in securing the wider documentary heritage of Wales, and adds value in terms of leadership and support for the archive sector

Weaknesses:

- More complex option, requiring legislative change, and significant investment
- Prosaic nature of collections (modern records) unlikely to capture public imaginations

Model 4: A National Archive – oversight of public sector recordkeeping; archive sector leadership; and central service provision A National Archive for Wales with responsibilities for Welsh public records, statutory powers over local authority recordkeeping, and a leadership role for the archive sector, including central support services.

Strengths:

- Provides the cultural focus / identity of a Welsh national institution; delivery model in advance of that of other UK home nations; physical services would be delivered within Wales
- Assists in securing the wider documentary heritage of Wales, and adds value in terms of leadership and real practical support for the archive sector

Weaknesses:

- Further increased complexity, requiring legislative change and significant additional investment
- Potential to impact adversely on the resourcing of other national institutions

Model 5: A National Archive System – oversight of public sector recordkeeping; local archive service delivery Constituting local authority archives as part of a Wales-wide system alongside a central national archive with responsibilities for Welsh public records, and oversight of recordkeeping in local authorities.

Strengths:

- Provides the cultural focus / identity of a Welsh national archival system, encompassing a central national body, and local service points; unique and ambitious delivery model in advance of that of other UK home nations
- Physical services would be delivered within Wales; model enables equality of service provision across Wales, sustaining local services
- Secures the truly national documentary heritage of Wales, with a delivery model which is linked up across the country

Weaknesses:

- Hugely complex and the most costly, requiring significant investment and a long time-frame
- Requires legislative change, and transfer of custody of property and records
- Potentially not acceptable at local political level

1. Introduction

*“A nation must be judged on how it conserves its archives.
Our future depends on our past and we must make sure that it is always available.”*

Lord Montagu of Beaulieu, House of Lords, 1994

Background

Wales is the only devolved administration in the UK which does not have a dedicated national archive. In 2018/19 the Welsh Government therefore made a commitment to undertake a feasibility study for a National Archive for Wales.

Elizabeth Oxborrow-Cowan Associates were commissioned to complete an initial options appraisal as part of the delivery of this feasibility study, and as the basis for further research.

This report presents the findings of this initial study into establishing a National Archive for Wales. It considers the nature of public records and the characteristics of an effective national archive, the current archival ‘ecosystem’ in Wales and existing national archive provision, legislative and other requirements, and the particular challenges of managing the digital record. The report concludes with a high level assessment of potential service models for delivering a National Archive.

Methodology

The approach and methodology for this study were designed to collaboratively establish the most appropriate service model for delivery of national archive functions in Wales.

To deliver this work, Elizabeth Oxborrow-Cowan Associates conducted:

- A comprehensive review of the current public records systems, and its underpinning legislation, including the Government of Wales Act;
- An analysis of national archive models, including a review of English-language legislation underpinning other national archives within and outside the UK;
- Profiling of the current archival ‘ecosystem’ in Wales; identifying the strengths and weaknesses of current provision;
- Discussion with key national and sector stakeholders through a series of workshop events and interviews;
- Interviews with national archive leaders from other UK home nations;
- Interviews with national archive CEOs from international comparators in Australia, Canada, Ireland and New Zealand;
- Evaluation of the issues for national archive provision arising from digital information management and the requirements for preserving the national digital record;
- Identification and appraisal of the potential options for delivery of national archive functions in Wales.

The Public Record

A 'record' can be defined as:

'...information created, received and maintained as evidence and as an asset by an organization or person, in pursuit of legal obligations or in the transaction of business.'²

Records can be in any format.

Public records are a legally defined type of record. In the UK under the Public Records Act 1958 (Sch 1) public records are defined as records belonging to Her Majesty, in particular records of government departments and offices, commissions or other bodies or establishments under the government (including for example executive agencies). They also include records of courts and tribunals, NHS bodies and the armed forces.

'Welsh public records' are separately defined by the Government of Wales Act 2006, but currently fall under the remit of The National Archives (UK, England and Wales) in accordance with the Public Records Act 1958.

Why do 'public records' matter?

Public records are important because they are the definitive primary record of the process, decisions and actions of central government, and other public institutions. As such they enable several vital functions in a democratic society:

- Ensuring democratic accountability; evidencing government decisions and actions.
- Informing government decisions and enabling government business by documenting past actions.

- Ensuring justice and the rule of law by capturing the decisions and precedent of law courts.
- Providing a rich resource for scholarship, research and education; informing areas as diverse as human rights, citizenship, historical inquiry and commercial business.
- Forming part of a wider infrastructure of historical records, which together are the repository of a nation's experience; shaping individual, community and national identity.

Characteristics of the public record

To ensure the quality and utility of the public record there are four characteristics that have to be present and maintained regardless of the individual record type:

Authenticity – we need to be able to trust that the record is what it purports to be.

Reliability – we need to be confident that it accurately represents the event it is documenting (allowing for the perspective of the record creator).

Integrity – we need to be able to see sufficient detail and authority in the content to provide a coherent record of the event being documented. Systems used to store records should be protected from corruption, loss, theft, or any other activity that might threaten their integrity.

Usability - the archive must be in an accessible location and usable condition. This means that they must be discoverable by those who may have an interest in using the records, legible and robust enough to withstand use.

² ISO 15489-1:2016 Information and documentation -- Records management

Maintaining the public record

There are several accepted methods of maintaining these vital characteristics.

A records (or information) management programme will incorporate several strategies for ensuring the authenticity, reliability, integrity and usability of records.

These strategies will assist in ensuring that records are useful for day-to-day business for as long as required but also that they can be preserved effectively as archives:

- The right records need to be selected for permanent preservation and transferred to a suitable repository.
- Information about the records (metadata) needs to be captured and maintained to demonstrate authenticity and integrity.
- Records must be reviewed for sensitivity / closure requirements, in line with information legislation.

- Information security must be of a suitable standard to prevent records being tampered with or removed without authority.
- Finding aids need to be in place to ensure that records can be discovered and retrieved.
- Conservation and preservation programmes must be established to ensure the records remain usable; this presents particular challenges for records in digital formats.

Maintaining the historical public record then requires a national archive with a clear purpose, supported by a sufficient infrastructure of physical, digital, interpersonal and intellectual components to meet all these requirements.

About this report

This report has been developed by Elizabeth Oxborrow-Cowan (Consultant Archivist) with specialist advice from Paul Gibbons (Freedom of Information Consultant) and James Grimster (Director of Orangeleaf Systems).

Representatives of Archives and Records Council Wales, the National Library of Wales, the Royal Commission on the Ancient and Historical Monuments of Wales, and Amgueddfa Cymru-National Museum Wales were involved in a series of workshops.

The authors are also grateful to the following organisations for their contribution: National Archives Australia; Archives New Zealand; Library and Archives Canada; The National Archives;

National Records of Scotland; Public Record Office of Northern Ireland; the National Archives of Ireland.

The report is structured as follows: Chapter 2 reviews definitions and models for national archives; Chapter 3 considers current arrangements, the public record system, role of The National Archives and the archive sector in Wales; and Chapter 4 sets out the requirements for national archive provision, including the particular challenges posed by the digital record. The report concludes with an options appraisal of the identified potential operating models (Chapter 5).

Appendices set out supporting information relating to national archive services and legislation, and provide indicative costings.

2. National Archives: Definition & Models

“Member States are encouraged to provide appropriate legislative frameworks for memory institutions and ensure their necessary independence in preserving and providing access to documentary heritage.”

UNESCO, Recommendation on Documentary Heritage, 2015

Definition

The national archive as a concept emerged from the public record office model for archival provision. The difference between the two approaches is essentially one of breadth of responsibility.

The public record office is focused on the curation and access of public records, however defined, and fulfils a distinct record-keeping purpose without regard to external concerns.

A national archive undertakes wider responsibilities within the archive sector to ensure the health of the national archival heritage, spread understanding and encourage use of that heritage.

Modern archives legislation tends to focus on the establishment of national archives rather than public record offices. Several countries have also moved their national archive repository from being a public record office to a national archive service in recent years. For example, the UK Public Record Office became The National Archives in 2003.

The differences between a public record office and national archive service are summarised in the table below:

Public record office	National Archive Service
Collects solely public records	May collect records of non- governmental organisations and individuals
Advises only on the care and access of public records	Provides guidance and advice on archival matters to both governmental and non-governmental organisations
	Proactively communicates the value and use of archives generally
	Often has a stated educational function
Focused on its own activities without a wider remit to the archival community.	Wider responsibility to support the archival community in the country generally.
	Undertakes an inspection function with regard to other organisations holding public records to ensure the care of those records

Core Qualities

There is no one model for a national archive. Each country develops its own approach. Nevertheless, a national archive is a very particular institution. However it is constituted there are key characteristics it must fulfil to be capable of securing and providing access to the public record for the long-term.

Research for this study consulted with a number of international national archive institutions on the practical realities of how they are constituted. The following core qualities comprise a synthesis of their views on what is required for effective provision in the context of a National Archive for Wales:

<i>For the nation</i>	<ul style="list-style-type: none"> Effectively delivers accountability for the Welsh people through a meaningful record of Welsh Government activity Embodies, preserves and promotes the nation's culture, identity and language for individuals and communities; representing Wales within the UK and internationally Complements and works with other national institutions to ensure a coherent national cultural offer Supports the wider Welsh archival 'ecosystem' to ensure a comprehensive system of collection, care and access for the nation's documentary history
<i>Statutory</i>	<ul style="list-style-type: none"> A National Archive for Wales with defined responsibilities, roles, and remit Clear definition of Welsh public records and powers to ensure their survival as evidence for current and future generations Potential for statutory powers to provide oversight over public sector recordkeeping more widely; ensuring wider democratic accountability and transparency
<i>Authoritative</i>	<ul style="list-style-type: none"> Recognised for its responsibilities and oversight over recordkeeping within the Welsh Government, and potentially across the wider Welsh public sector; statutory powers to effectively act in its defined role An identified role for a responsible Minister / advisory body Recognised internationally for excellence in archival practice, working within national and international standards frameworks
<i>Independent</i>	<ul style="list-style-type: none"> Sufficient independence from the Welsh Government to objectively deliver its functions Guided in its activities by a knowledgeable, independent Advisory Council
<i>Long-term</i>	<ul style="list-style-type: none"> Collecting for the future; ensuring an authoritative, coherent and full record of government for future generations Sustainably resourced to ensure that the Welsh public record remains accessible in the long-term

<i>Secure</i>	<ul style="list-style-type: none"> • Resources and infrastructure to ensure the physical and intellectual security and integrity of Wales' digital and analogue record • Risk aware; ensuring that critical national infrastructure and evidence is held securely and remains accessible • Robust systems to ensure the Welsh Government observes statutory requirements
<i>Accessible</i>	<ul style="list-style-type: none"> • Ensuring the accessibility of the Welsh public record for accountability and research purposes • Transparent; operating on the basis of open access to records, unless there are clear reasons for closure • Open and accessible to all, physically and online; proactively taking services out to stakeholders
<i>Visible, known and trusted</i>	<ul style="list-style-type: none"> • High profile among stakeholders as a known and trusted national body within Wales • Known by all those who would benefit from being able to use its services and collections
<i>Operates at scale</i>	<ul style="list-style-type: none"> • Capacity to identify, select, manage, preserve and provide access to large and complex collections; securing and providing access to the Welsh public record
<i>Innately digital</i>	<ul style="list-style-type: none"> • Resources and infrastructure to manage today's born-digital archive; equipped to address the particular challenges of preserving this record in the long-term • Systems and services enabling access through digital media and channels, to meet user expectations and requirements • Skills and capacity to actively participate in professional and wider debate around the deployment of digital technologies; positioned to deliver best practice and share learning internationally
<i>A leader in archival practice</i>	<ul style="list-style-type: none"> • Recognised for its specialism in archival practice; with infrastructure, resources and skilled staff to support effective operational delivery • Developing and delivering best practice in the management of archival records (analogue and digital); internationally recognised as a leader in the field
<i>Connected</i>	<ul style="list-style-type: none"> • Dynamic, productive relations with stakeholders, to ensure a high quality sustainable Welsh public record • Collaborative; working with other archives and cultural institutions to develop better services, and share learning • International in its outlook, aspirations and relationships
<i>Complex and flexible</i>	<ul style="list-style-type: none"> • Capacity and flexibility to manage large, diverse collections that are continuously accruing and technically complex; meeting statutory requirements and dynamic needs

Models for a National Archive for Wales

The brief for this study identified four potential options for delivery of a National Archive for Wales. In conducting the research for this study a fifth option was also identified and reviewed. These are detailed in the following table; information about comparator organisations is available in Appendix 1. A detailed review of each of these models is provided in Chapter 5.

Model 1: Augmenting existing arrangements

Under this model there would be no distinct National Archive for Wales and The National Archives (TNA) based in Kew would continue to act as the national archive service for the United Kingdom, England and Wales, taking custody of 'Welsh public records' and providing some level of support for the archive sector in Wales (see Chapter 3) in relation to its oversight of local 'places of deposit' for public records. Additional dedicated services focused on Wales – e.g. catalogues, discovery tools, educational content, loans of material to Welsh institutions – would however be developed.

Comparators: This research did not identify an existing example of such a structure.

NB: This model would require close dialogue with TNA to develop services that were practical and acceptable to all parties and to determine how developing these additional services would be resourced.

Model 2: A Welsh Public Record Office

Under this model a public record office for Wales would be established, with responsibilities focused on collection, management and access to Welsh Government records, and those of other designated 'Welsh public record' bodies.

Comparators: This is not a common model now in western countries, where most operate some form of national archive. One potential comparator is the Isle of Man Public Record Office, although this operates on a much smaller scale than would be required for Wales.

Model 3: A National Archive – oversight of public sector recordkeeping; archive sector leadership

Under this model a National Archive for Wales would be established, with responsibilities focused on collection, management and access to Welsh Government records, and those of other designated 'Welsh public record' bodies. Additionally it would have statutory powers to oversee record keeping in local authorities in order to maintain the quality of the record of local government. It would also have a leadership role supporting the wider archive sector, through provision of advice and guidance, training, and support for partnership working.

Comparators: The National Records of Scotland (NRS) fulfils analogous roles. NRS collects the records of Scottish central government under the Public Records (Scotland) Act 1937, and has oversight of local authority records management under the Public Records (Scotland) Act 2011. NRS directs dedicated funding from the Scottish Government to the Scottish Council on Archives which fulfils the sector leadership role.

Model 4: A National Archive – oversight of public sector recordkeeping; archive sector leadership and central service provision

Under this model a National Archive for Wales would be established, with responsibilities focused on collection, management and access to Welsh Government records, and those of other designated ‘Welsh public record’ bodies. Additionally it would have statutory powers to oversee record keeping in local authorities in order to maintain the quality of the record of local government. It would also have a leadership role supporting the wider archive sector, through provision of advice and guidance, training, *and delivery of central support services*. Whilst these would need to be defined they could include digital preservation, conservation, cataloguing programmes and outreach activity.

Comparators: This research did not identify an existing example of such a structure.

NB: Under this model responsibility for collecting, managing and providing access to local authority records would stay with the local authority via its own archive service.

Model 5: A National Archive System – oversight of public sector recordkeeping; local archive service delivery

Under this model a new National Archive System would be established, constituting local authority record offices as part of a Wales-wide system alongside a central national archive. Responsibility for collection, management and access would encompass both Welsh Government records, and those of other designated ‘Welsh public record’ bodies and extend to the records of local government. Additionally it would have statutory powers to oversee record keeping in local authorities in order to maintain the quality of the record of local government.

Comparators: This is a model, used in certain European countries where all central and local government archiving comes under the remit of the National Archive. This may or may not be centralised in one location, and may be a federated network of physical services working to a common vision and goals. Within the UK the closest example is the Public Record Office of Northern Ireland (PRONI) which, since its creation in 1924 has fulfilled the functions of a national archive, a national library, and county record office for the six counties of Northern Ireland, including holding private and church collections.

NB: This model would require close dialogue with local authorities, and careful consideration of how repositories would be distributed across Wales; given the immense local relevance of local authority archive collections, a single location may be unsuitable.

3. Current Arrangements

“National Archives should be given a leadership role within the community of archival institutions . . . to facilitate the development of a national archival system or network.”

International Council on Archives, 2001

The Public Records System

As the national archive for England, Wales and the United Kingdom, The National Archives (TNA), based at Kew, houses records from across UK central government, and the Welsh Government.

TNA works in accordance with the Public Records Act 1958, the provisions of which include the appointment of a Keeper of the Public Records who has a duty to take practical steps to preserve public records, as defined within the Act.

Public record bodies have to select and transfer public records (both analogue and

digital) to TNA or an approved ‘place of deposit’ no later than 20 years (the 20 Year Rule) after their creation.

Government departments and other public record bodies are expected to appoint a Departmental Record Officer (DRO)³ to manage this process in liaison with TNA.

TNA also exercises powers to appoint places of deposit for particular classes of records. These must be able to provide ‘suitable facilities for the safe-keeping and preservation of records and their inspection by the public’.

The Welsh Public Record

As of 2006, the Government of Wales Act (GOWA) created a specific class of Welsh public records. However until such time as an order is made for the Welsh Ministers to take up powers to preserve Welsh public records, they continue to be treated in accordance with the terms of the Public Records Act 1958.

It should be noted that the definition of Welsh public records does not encompass records generated in Wales by functions that are not devolved. For example, court records, where the court system covers all of England and Wales as one.

Welsh public records (defined by GOWA) are administrative and departmental records of:

- the Welsh Government
- the Auditor General
- the Welsh Revenue Authority
- any government department wholly or mainly concerned with Welsh affairs
- any office, commission or other body under government wholly or mainly concerned with Welsh affairs or in a field in which Welsh ministers have functions
- anybody specified in an order by the Secretary of State
- bodies listed at s.148(2) including NHS bodies, Further and Higher Education Funding Councils for Wales, Local Government Boundary Commission for Wales and several other bodies.

³ The Welsh Government has its own DRO in post.

The Role of The National Archives

The National Archives (TNA), based at Kew, currently acts as the national archive for England, Wales and the United Kingdom. Its statutory responsibilities are:

- To ensure the safe administration of the public record by liaising with record creating bodies to provide guidance on recordkeeping and to facilitate transfer of selected records to TNA.
- To provide a comprehensive collections management regime to ensure the survival and long-term usability of transferred records.
- To provide public access where appropriate; this now includes access online, via the public searchroom, and through an extensive education and outreach programme.
- To appoint and monitor approved 'Places of Deposit' (PoDs) to ensure they are fit to accept and provide access to public records.
- To report annually to the Secretary of State on its public record work.

TNA also has responsibilities for private records under the HMC Warrant⁴; this includes publishing information on the location and nature of records of all types across the UK, highlighting their research value, and advising on their care.

To deliver these responsibilities TNA:

- Invests in research and development to ensure the long-term preservation and usability of the public record; particularly in the emerging and technically complex area of digital preservation.
- Provides central co-ordination for the Archive Service Accreditation scheme

(all PoDs are required to meet the Accreditation Standard).

- Develops and maintains 'Discovery' (a search engine for collections and archive services across the UK), and the Manorial Documents Register (an index of English / Welsh manorial records).

TNA has additional responsibilities in the following areas:

- Leadership responsibility for the archives sector in England
- Support for the archives sector more generally through the development of standards and provision of expert guidance to public and private archives across England and Wales.
- Providing expert advice on archival material to the Acceptance in Lieu (AIL) Panel, which advises Ministers in England, Scotland, Wales and Northern Ireland on the acceptance of material of national scientific, historic or artistic interest in lieu of tax.

Within Wales, TNA's responsibilities can be summarised as follows:

- Accepts and manages the Welsh public record in liaison with the Welsh Government's Departmental Record Officer.
- Appoints and inspects approved places of deposit in Wales in line with the Accreditation Standard.⁵
- Supports the archive sector in Wales through provision of advice and expert guidance on archival matters, and in relation to meeting their requirements as a Place of Deposit.

⁴ The Royal Commission for Historical Manuscripts (or Historical Manuscripts Commission HMC) was appointed under Royal Warrant in 1869; it became part of TNA in 2003.

⁵ The administration of Welsh applications to the Archive Service Accreditation scheme is managed by the Welsh Government's Museums Archives and Libraries Division.

Welsh Government Records⁶

Welsh Government records are Welsh Public Records (as defined by the Government of Wales Act GOWA), and as such are currently managed in accordance with the Public Records Act 1958.

The records of the National Assembly for Wales and the Welsh Assembly Commission are not designated as Welsh Public Records under this legislation and they are responsible for their own records.

Transfers to TNA

Under current arrangements TNA and the Welsh Government have a joint responsibility to work together to select records of historic value for permanent preservation, and ensure their transfer and ongoing accessibility.

The Welsh Government's Departmental Record Officer (DRO) appraises and selects records for permanent preservation in accordance with the relevant Operational Selection Policy. Records are reviewed for sensitivity, catalogued, and transferred to TNA for long-term preservation and access.

To date, transfers to TNA have been small, c.1% of the records created in each year from 1965-1992. Under the 20 Year Rule post-devolution records (1999 onwards) are scheduled for transfer from 2021; it is anticipated that c.2% may be selected for permanent preservation.

In practice, post-devolution digital Welsh Public Records are already being transferred to TNA.

While records of Welsh Government Sponsored Bodies are also Welsh Public Records under the terms of GOWA, they are responsible for their own transfer arrangements to TNA.

Support from TNA

A Concordat between TNA and the Welsh Government formalises arrangements for the management of public records in Wales. It sets out a working framework intended to promote constructive cooperation and communication. The Concordat does not represent a formal contract and is not legally binding.

To date TNA has provided a free service to the Welsh Government which encompasses the following areas of support:

- advice and guidance to promote best practice in information and records management; development of policies, process, tools and technology that take account of legislative and business requirements
- assistance and training to improve information management standards; including Information Management Assessments (IMAs)
- guidance / training on the selection, appraisal and transfer of records and sensitivity reviews; enabling compliance with the 20 Year Rule
- guidance and support on information risk; cyber threats, information security, exporting and transferring electronic data and Machinery of Government (MoG) changes
- support, guidance and training in tackling the challenges of digital continuity and preservation; ensuring continued access to digital information in the future.

⁶ Additional information provided by Welsh Government Information and Archive Services

The Archive Sector in Wales

The formal archive sector in Wales collects, preserves and makes accessible much of the national documentary record of Wales. It comprises 21 institutions:

13 Local Authority Services

South East Wales: Glamorgan Archives; Gwent Archives; West Glamorgan Archive Service.

North Wales: Anglesey Archives; Conwy Archive Service; Denbighshire Archives; Flintshire Record Office; Gwynedd Archives (Caernarfon Record Office / Meirionnydd Record Office); Wrexham Archives and Local Studies.

Mid and West Wales: Carmarthenshire Archive Service; Ceredigion Archives; Pembrokeshire Archives; Powys Archives.

5 Higher Education Services

Aberystwyth University Archives; Bangor University Archives and Special Collections; Cardiff University, Special Collections and Archives; Swansea University, Richard Burton Archives; University of Wales Trinity St David, Roderic Bowen Library and Archives

3 National Institutions

National Library of Wales;
Royal Commission on the Ancient and Historical Monuments of Wales;
Amgueddfa Cymru-National Museum Wales

Of these 16 are recognised by The National Archives as places of deposit for locally generated public records.

Together they hold the historic documentary record of Wales, from the C11th to the present day. These records are in a variety of formats, from parchment and paper documents, maps and photographs, to today's digital files.

They document the key institutions and structures that have shaped Welsh life:

- Local government
- The established church and other religious bodies
- Business and industrial enterprise
- Landed estates
- Charities
- Local justice
- Hospitals

Collections also include the records of individuals – politicians, businessmen, engineers, writers, artists – famous and ordinary people whose experiences contribute to Wales' national historical narrative.

While much of this material will be of local or community interest, key collections will have wider national and international research significance. For example, UNESCO's Memory of the World UK Committee has recognised four items of Welsh documentary heritage as of outstanding importance.

This unique and irreplaceable historic resource, has a real contribution to make to Wales' national well-being (as set out over the page). Services also have an active role in recording the present for future generations.

At the same time archive services are among the least known of Wales' cultural and heritage bodies, with onsite visits declining as users increasingly look for the information they need online.

More critically, with the backbone of provision provided by local government, there are concerns regarding the long-term sustainability of the sector, with significant challenges in terms of resourcing, skills and infrastructure.

Archives and Well-being

The place of Welsh archives in the life of the nation can be clearly related to the seven Well-being Goals (Well-being of Future Generations (Wales) Act 2015):

A prosperous Wales

- Providing learning opportunities for people of all ages; archives can be used to support the curriculum, to underpin academic research of international importance, and as a valuable resource for lifelong learning
- Providing volunteering and internship opportunities that improve skills and employability
- Maintaining archival resources that can be used to support academic research, knowledge creation, business innovation and heritage tourism

A resilient Wales

- Preserving and providing access to resources which researchers can use to identify changes in the natural environment and climate over time
- Supporting environmental action through access to relevant records under the Environmental Information Regulations

A healthier Wales

- Providing historical resources for initiatives such as reminiscence therapy, supporting people with dementia
- Supporting mental well-being; using records to strengthen understanding of personal and community identity
- Enabling positive social engagement, reducing loneliness; many archive users and volunteers are older people for whom the archive provides valuable social contact and an active interest
- Providing safe spaces where people feel welcome and supported

A more equal Wales

- Through being open to all, offering socially inclusive and free access to the records of local communities
- Collecting records that represent all elements of society, and securing that record for future generations

A Wales of cohesive communities

- Helping communities understand their history and origins through collecting and providing access to local community records
- Providing safe, calm environments where members of the community can come together

A Wales of vibrant culture and thriving Welsh language

- Securing and promoting access to the record of our national history and culture, including our Welsh language archives
- Delivering a variety of opportunities to engage with Welsh culture and history; from research using original documents, to volunteering, educational work, and outreach activity
- Promoting and protecting Welsh culture and language through partnership working with other cultural and heritage organisations

A globally responsible Wales

- Maintaining the record that holds our organisations and government bodies to account
- Seeking to develop more sustainable ways of working

Issues and Opportunities

The health of the archive sector in Wales has particular implications for the sustainability of our national documentary record. The sector is currently on a cusp; digital technologies, new audiences and partnerships offer immense potential for greater accessibility and relevance, while funding constraints threaten to reduce services to their most basic level.

<p>Strengths</p> <ul style="list-style-type: none"> • Collections of local, national and international importance, covering the whole of Wales • Skilled and knowledgeable staff • Network of services across Wales offering local access; many operating from new or refurbished premises • Strong educational and research offer • Quality of service delivery (13 services in Wales are recognised as meeting the Archive Service Accreditation Standard, others working towards Accreditation) 	<p>Weaknesses</p> <ul style="list-style-type: none"> • Challenges in collecting a representative record of modern Wales (e.g. lack of contacts with hard to reach communities; limited digital capacity) • Lower public profile than other cultural and heritage bodies; correspondingly lower level of physical visits / use • Lack of engagement with diverse communities (low income, immigrant and ethnic minority groups) reflecting capacity and skills issues • Poor accommodation with limited storage capacity in some services; need for substantial capital investment
<p>Opportunities</p> <ul style="list-style-type: none"> • Partnership working to extend capacity, enable collection and audience development, and deliver against digital preservation requirements • Development of new digital services; widening awareness and use, reaching new online audiences • Potential to contribute to social agendas: mental health; social cohesion; skills development • Potential to contribute to accountability / compliance agendas • Access to external funding for development projects (e.g. National Lottery Heritage Fund) 	<p>Threats</p> <ul style="list-style-type: none"> • Funding constraints, reducing capacity and limiting service development • Prevalence and changing nature of digital record; increasing volume and complexity of new technologies present a significant challenge for collecting / preservation • Reductions in staffing levels (due to financial constraints) limiting capacity – particularly for outreach, education and conservation functions • Limited sector-wide digital preservation skills and capacity • Falling on-site visits (as users increasingly access information online) • Lack of long-term funding, staff capacity and expertise for targeted audience development, development of digital services and partnership working • Brexit; potential to impact operationally on national institutions in particular (loss of EU funding, partnerships and staff)

4. A National Archive for Wales

“Open access to archives enriches our knowledge of human society, promotes democracy, protects citizens’ rights and enhances the quality of life.”

UNESCO, Universal Declaration on Archives, 2010

Government of Wales Act 2006

Section 147 of the Government of Wales Act 2006 (GOWA) sets out provisions for the transfer of responsibility for Welsh Public Records to the Welsh Ministers (or a member of staff of the Welsh Government). This includes public record provision analogous to that made by the Public Records Act 1958.

An order under this section would impose “on persons responsible for Welsh public records duties relating to the selection of such records for permanent preservation, the safe-keeping of such records and their transfer to a place specified in, or appointed under, the order.”⁷

Any such order would be made by the Secretary of State for Digital, Culture, Media and Sport following consultation with the Welsh Ministers. UK Cabinet Ministers and government departments would also need to be consulted regarding any impact on their functions.

Before any order could be made The National Archives would also need to seek assurance that the proposed “arrangements for the selection and long term storage of, and public access services to, Welsh public records [are] in accordance with the standards that apply to UK archives’ repositories.”⁸

Archives Legislation

An order under GOWA would merely transfer responsibility for Welsh Public Records. The Assembly would then need to approve its own public records legislation⁹ to establish a National Archive for Wales or Welsh Public Record Office.

It would be a matter for the Welsh Government and Assembly to decide the scope of that legislation, but as a minimum it would need to consider:

- the definition of Welsh Public Records and whether this needs to be extended to cover other areas of public life;
- the extent of functions relating to guidance and supervision of public record bodies on the management of their records;
- the extent of functions relating to the collection and safe-guarding of non-public records of national value;
- the extent of functions relating to leadership and supervision of the archive sector in Wales;
- the organisation(s) that would take responsibility for the preservation and accessibility of Welsh Public Records, and delivery of associated functions.

⁷ Government of Wales Act 2006, s.147(1)(b).

⁸ Concordat between The National Archives and the Welsh Assembly Government, 2010, (4).

⁹ See Appendix 2 for examples of the scope of coverage of existing archives legislation from comparators.

Standards and Expectations

As the National Archive for Wales any new body would be required to meet relevant standards for professional practice and quality of service delivery, demonstrating equivalency of provision with other UK home nations.

The new institution should therefore be capable of meeting the requirements of the UK-wide Archive Service Accreditation Standard¹⁰ across its three key areas as follows.

<p><i>Organisational Health</i></p> <p>Operational context with sufficient resources and planning to sustain the organisation over the long-term.</p>	<ul style="list-style-type: none"> • Buildings and storage for housing archives and archive services, both analogue and digital, where arrangements are sufficient to keep the collections physically secure and accessible. • Sufficient funding to enable the service to deliver its mission and stated forward plans. • Staffing appropriate in experience and numbers to carry out the service's responsibilities and plans.
<p><i>Collections</i></p> <p>Infrastructure, policies, plans and procedures to ensure effective collection management and care.</p>	<ul style="list-style-type: none"> • Resourced to support collection development activity; ensuring a representative national record • Resourced to support cataloguing activity and online discovery tools; ensuring that people can identify the records they need • Resources to support collection care activity; ensuring the collections (analogue and digital) remain accessible to future generations
<p><i>Stakeholders and Their Experiences</i></p> <p>Infrastructure, policies, plans and procedures to ensure effective access to collections, and engagement with the community and stakeholders served.</p>	<ul style="list-style-type: none"> • Resourced to support on-site access services, and deliver relevant education and outreach programmes • Resource to deliver appropriate online access services, reaching out to virtual audiences

¹⁰ Archive Service Accreditation was introduced in 2013 by a partnership of national archive bodies and institutions across the UK, including the Welsh Government's Museums Archives and Libraries Division (MALD). It defines good practice and agreed standards for UK archive services, is managed centrally by The National Archives, and is administered in Wales by MALD. Under current arrangements all Places of Deposit for public records are expected to achieve and maintain Accredited status. The National Archives (UK, England and Wales), National Records of Scotland, and Public Record Office of Northern Ireland are all Accredited services.

The institution should also be equipped to deliver (as a minimum) an equivalent service to that provided under current arrangements. Workshops with national and sector stakeholders emphasised the value of the following services provided by The National Archives.

Welsh Government and other Public Record Bodies	<ul style="list-style-type: none"> • Advice and guidance on best practice in information and records management and public records issues; facilitating the safe administration of the public record and its transfer to archival custody • Physical storage and access facilities for the Welsh public record, including a fully functioning digital infrastructure capable of preserving digital records in line with accepted standards • A comprehensive collections management regime to ensure the survival and long-term usability of transferred records • Facilities for public access both on-site (via a public searchroom), through online services (including an online catalogue), and via relevant education and outreach programmes.
Places of Deposit for Public Records	<ul style="list-style-type: none"> • Inspection regime supporting standards particularly for service accommodation; providing authoritative advice on standards required to parent bodies • Readily available free advice on public record issues • New burdens funding for implementing changes to the public records system under the 20 Year Rule
Archive Sector	<ul style="list-style-type: none"> • Professional advice and guidance (website, documentation, advisory services) on archive and collections management • Provision of high quality training in relevant areas • Promoting the role of archives to partners and the public; generating profile for the sector and archives generally • An authoritative partner and supporter of the Archive Service Accreditation scheme • International recognition and credibility for its work and outputs; supporting the sector professionally • Research and funding role for the development of platforms and tools which support the wider archive sector (e.g. digital preservation developments) • Advisory role for private archives; supporting the survival of those elements of the national documentary heritage in private hands

The Digital Challenge

There is a tendency to view the establishment of a national archive in terms of the building it occupies and the physical records in its care. The requirements for securing, preserving and providing access to this analogue record are also well understood and relatively straightforward to manage.

The vast majority of modern records are however created digitally.¹¹ It is likely therefore that managing the digital public record will be the key, even primary, function of any new National Archive for Wales. This digital record is however fundamentally vulnerable, facing a range of inbuilt and external threats:

- Rapid technological obsolescence
- Complex chains of interdependence (e.g. particular software only being able to work within specific operating environments)
- The ease with which digital objects can be amended or re-purposed
- The sheer volume of records, making effective management more difficult
- The myriad of formats which are constantly evolving and increasing in number
- The complexity of digital objects, ranging from simple textual documents, to complex databases
- The numerous platforms and points of creation from which records can emerge (personal computers, intranets, websites, social media, etc.)
- Security issues whereby unauthorised changes or damage can be inflicted
- Uncontrolled destruction or loss whether intentional or unintentional

The key risk to the modern digital record is lack of proper management; this is also the key solution, continuous management from the point of creation onwards, to not only ensure its survival, but its authenticity, reliability, integrity and usability.

Preserving the Digital Record

Management of digital records involves a number of key stages, each of which requires significant input, support and monitoring by specialist staff working in close cooperation with the depositing organisation:

- *Appraisal, selection, sensitivity review*
Working directly with depositors and public record bodies, providing close support for processes such as sensitivity review, redaction and closure assessment.
- *Transfer*
Working directly with depositors and public record bodies, providing close support in the development of process and tools to enable digital transfers.
- *Storage*
Providing digital infrastructure, certified as a Trusted Digital Repository, meeting required international standards for long term, reliable digital preservation.
- *Access, sharing and publication*
Planning for an open data approach to making the records available; providing a bilingual 'discovery' interface to enable access, but incorporating safeguards for sensitive and restricted material.

All of this must be of a quality that assures the security, authenticity, integrity and usability of the public record.

¹¹ From 2010 the bulk of Welsh Government records are digital, with only a small component in paper format.

The Digital National Archive

Providing preservation and access to the national digital record is complex, challenging and resource-intensive.

The National Archives (TNA) is a recognised leader in this field, and has established a fully functioning first generation digital archive with infrastructure capable of safely securing and actively preserving large quantities of records and associated descriptive metadata.

TNA has invested significantly in systems and expertise, and this remains an area of continuing development, where there are challenges around technological change, volume, and in recruiting and retaining the necessary digital expertise.

At present, no organisation in Wales has the knowledge or capability to manage digital records on this scale.

There are commercial providers in the digital preservation field which may be able to provide services that address elements of the requirements in this area, notably storage. The solutions they offer would need careful evaluation to ensure they are fit-for-purpose and do not expose the Welsh Public Record to undue risk.

Any consideration of establishing a National Archive for Wales *must* seriously contemplate the creation and maintenance of a robust digital preservation system, because the majority of its collections *will be born digital records*.

The role of a national archive in supporting the wider archival community is also of relevance here. A National Archive for Wales would be looked to by the sector in Wales as a leader in the field, with the potential to support the digital preservation community through open knowledge exchange, or even through the provision of centrally delivered services.

In order to fulfil its remit, whatever the scope, the digital national archive will need to invest in research, expertise and technology:

- Recruiting specialist technical staff: software developers, system analysts, cybersecurity experts, etc.
- Supporting cutting edge research in the field of digital preservation and emerging technologies, e.g. blockchain
- Moving beyond storage to address access needs through emulation and other strategies; building its own tools
- Learning from other leading international institutions, sharing knowledge and best practice
- Being agile, flexible and resilient in its infrastructure and approach

Inadequate system provision risks loss of critical information, non-compliance with information legislation, and severe reputational damage for Wales.

Risk

There will be risks associated with establishing and operating a national archive, particularly around the digital record. Inadequate provision could lead to loss or damage to the record, an inability to comply with information legislation, and resulting reputational damage.

Further and detailed consideration would need to be given to these risks as the implementation of any model is explored in more depth. An outline risk register, framed in terms of compliance with the Archive Service Accreditation Standard is provided here.

Risk	Impact	Probability	Mitigation
<i>Organisational Health:</i> Inadequate buildings and storage for analogue records	HIGH – analogue records need particular conditions for their long-term survival; inadequate provision will place the public record at risk of loss or damage.	LOW – the requirements for archival buildings and storage are well understood and can be specified in line with international standards.	Building specification in line with international standards; provision of resources to ensure appropriate build quality in line with this specification.
<i>Organisational Health:</i> Inadequate digital infrastructure for transfer and preservation of the digital record	HIGH – digital records require infrastructure, systems and expertise to ensure their long-term survival and accessibility; inadequate provision will place the digital public record at risk of loss.	HIGH – preservation and transfer of digital records is complex, challenging and resource-intensive.	Creation and maintenance of robust digital transfer and preservation systems, with adequate infrastructure and skilled staff.
<i>Organisational Health:</i> Insufficient ongoing funding	HIGH – the public record is placed at risk; records may suffer loss or damage, or may not be accessible in the longer-term; potential of non-compliance with information legislation and resulting reputational damage; loss of accountability and a national cultural resource.	HIGH – effective record-keeping may not be seen as a priority for resourcing in times of financial constraint; lack of understanding of the resources necessary to effectively deliver national archive functions.	Quantify and assign sufficient budget and resources to ensure effective delivery.
<i>Organisational Health:</i> Inability to attract sufficient skills and staff to address specialist functions, e.g. in supporting digital transfer / preservation	HIGH – unable to support current and emergent complexities of managing the Welsh Public Record.	HIGH – recruiting and retaining specialist staff, particularly in the digital area is challenging globally; many public sector organisations are unable to offer market rate wages; there may be more attractive competing locations.	Investment in recruitment at an appropriate level; ensuring that research and development work and infrastructure is appropriately resourced to attract and retain key staff; strategies to ‘grow your own’ specialists through internal training and internship programmes.

Risk	Impact	Probability	Mitigation
<i>Collections:</i> Restrictive legislation does not provide sufficient powers to identify and preserve a fully representative national record	MEDIUM – key records do not survive, undermining accountability, and the evidential and cultural record of Wales.	MEDIUM – consideration needs to be given to the definition of Welsh Public Records and which public sector organisations should be in scope.	Frame legislation to identify and bring in scope the organisations which contribute to Wales’ national life; ensure that the legislation includes powers of oversight over the management of records and their transfer to archival custody.
<i>Collections:</i> Insufficient capacity to manage the scale and complexity of appraisal, selection and sensitivity review processes for digital transfers	HIGH – unable to accurately assess whether a record needs to be open or closed; potential to breach data protection or fail to meet freedom of information requirements; potential reputational damage from inappropriate release of sensitive data.	HIGH – the volume and complexity of digital records means that the processes for review and selection are especially challenging; the ease with which digital materials can be distributed once available through open access, means that access control is also problematic.	Sufficient resourcing to enable manual checks of the volume of record holdings; application of risk management strategies and development of review processes. Sharing learning with other national archives which face similar issues.
<i>Collections:</i> Failure to review and upgrade digital infrastructure as technologies develop	HIGH – records in collections become inaccessible; the organisation is not placed to secure and preserve records produced by emergent technologies.	HIGH – digital technologies continue to develop at pace and in ever-increasing volumes.	Constant review of digital preservation systems and best practice in the field; resources to upgrade and constantly develop digital preservation systems to meet current needs.
<i>Collections:</i> Failure to maintain adequate cyber-security measures	HIGH – potential loss of utility and reliability of the record, limiting its standing as reliable evidence, for legal admissibility and business purposes.	HIGH – the intentional alteration of records by cyber-attack is a growing area of concern.	Ongoing implementation of appropriate security measures; access to relevant knowledge, expertise and systems.

Risk	Impact	Probability	Mitigation
<i>Stakeholders:</i> Insufficient capacity to build productive relationships with record creators	MEDIUM – records of long-term value to the Welsh Public Record are not identified and preserved.	HIGH – record-keeping is often viewed as a back-office function and not given sufficient priority within organisations; close contact is needed to ensure that public record requirements are met.	Sufficient resourcing to build and maintain good relationships with record creators and ensure that public record requirements are addressed.
<i>Stakeholders:</i> Insufficient capacity to engage the wider public with collections	MEDIUM – public not supportive of the National Archive and its resourcing.	MEDIUM – much of the public record may only be of immediate interest to government, related bodies, and academics; the public may not perceive any direct wider benefit.	Engagement and outreach work, using the national archive as an opportunity to explain the purpose of government and demonstrate accountability.

5. Potential Models: Options Appraisal

"[Archive management] is valued and carried out competently by all bodies, private or public, which create and use archives in the course of conducting their business."

UNESCO, Universal Declaration on Archives, 2010

Appraisal Criteria

This chapter of the report reviews the potential models for a National Archive for Wales (identified in chapter 2), in light of the research undertaken.

A high level analysis of the strengths and weaknesses of the individual models is provided based on following key criteria.

Desirability (the degree to which each option meets the strategic objectives and priorities of stakeholders)	
<p><i>Securing the Welsh Public Record</i></p> <p>How each model supports the collection and preservation of the public record; resulting extent of functionality</p>	<ul style="list-style-type: none"> • Types of public record collected: what is in / out of scope under each model? • Capacity to collect non-public records: how could each model safeguard non-public records of national interest? • Security of the public record: how effectively could each model ensure that the Welsh public record is secured and preserved over the long-term?
<p><i>Accessing the Welsh Public Record</i></p> <p>How each model supports the accessibility of the public record; resulting extent of functionality</p>	<ul style="list-style-type: none"> • Value / accessibility to researchers: how effectively could each model support research audiences? • Value / accessibility for the public: how effectively could each model support and promote access to the general public? • Value / accessibility for record creators: how effectively could each model support the access needs of record creators?
<p><i>Wider Benefit</i></p> <p>Added value delivered by each model; resulting extent of benefit</p>	<ul style="list-style-type: none"> • Benefit to wider Welsh documentary heritage: how effectively could each model support the wider archive sector in Wales? • Benefit to Wales as a nation: how could each model support and promote Wales' national interest?

Viability (the degree to which each option is financially viable and sustainable)	
<p><i>Creating the Infrastructure</i></p> <p>Requirements / considerations for each model in creating the necessary infrastructure; resulting ease of delivery</p>	<ul style="list-style-type: none"> Resources to establish: what is required under each model in terms of costs, knowledge, skills, and partnerships? Capital investment: what is required to provide the necessary physical infrastructure for storing and providing access to the public record? Digital preservation systems: what is required to set up the necessary infrastructure for preserving and providing access to the digital public record?
<p><i>Maintaining the Service</i></p> <p>Requirements / considerations for each model in maintaining the necessary infrastructure and services; resulting ease of delivery</p>	<ul style="list-style-type: none"> Resources to operate: what is required under each model in terms of costs, knowledge, skills, and partnerships? Digital preservation systems: what is required to maintain the necessary infrastructure for preserving and providing access to the digital public record? Access facilities and services: what is required under each model for delivering access onsite, remotely, and online?
Feasibility (the degree to which each option can be implemented)	
<p><i>Dependencies</i></p> <p>Dependencies for delivery of each model; resulting ease of delivery</p>	<ul style="list-style-type: none"> Legislative change: what are the requirements for new legislation, or amendments to existing legislation under each model? Transfer of custody: what are the requirements under each model for transfer of relevant records, property or staff held by another authority under existing arrangements?
<p><i>Logistics</i></p> <p>Considerations for the organisation and implementation of each of the models; resulting ease of delivery</p>	<ul style="list-style-type: none"> Administrative structures: what is required under each model in terms of governance, roles and responsibilities? Timescales to establish: what are the implications for each model in terms of timing of legislation, and infrastructure / service development?

Full appraisals for each model using these criteria are set out on the following pages; indicative costings are provided based on the assumptions set out in Appendix 3.

Model 1: Augmenting existing arrangements

The National Archives (TNA) would continue to act as the national archive service for the United Kingdom, England and Wales, with additional dedicated services focused on Wales.

	Assessment Criteria	Rationale / Comments
Desirability	Securing the Welsh Public Record	<ul style="list-style-type: none"> • Only responsible for Welsh public records as designated by the Government of Wales Act 2006 and in accordance with the Public Records Act 1958. • No opportunity for wider review of public record definition, and what should constitute the Welsh national record. • No responsibilities or capacity for securing non-public records in the national interest. • Arrangements for securing and preserving the Welsh public record as defined are however strong, in accordance with established practice at TNA. • Concordat with Welsh Government in place, including arrangements for digital transfers.
	Accessing the Welsh Public Record	<ul style="list-style-type: none"> • Research audiences and the general public would continue to physically access the Welsh public record at TNA in Kew, outside Wales. Digital access would be in line with TNA services. • Access for record creators would be in accordance with TNA policy; transferring bodies are now expected to view records on-site at Kew and take digital copies using their own devices. • Welsh public records would remain divorced from the wider documentary context of Wales, but would sit alongside the UK record with which they were generated and are managed. • New services could be developed to enhance access with a Welsh focus – catalogues, discovery tools, educational content, etc. – potential also for physical loans to Welsh institutions. Feasibility, effectiveness and reach would be dependent on the nature / extent of the services proposed. • Access services would not automatically comply with Welsh language standards.

	Wider Benefit	<ul style="list-style-type: none"> • Support for the wider archive sector in Wales would remain on the basis of the services provided through TNA and the Welsh Government's Museums Archives and Libraries Division. • Potential lack of clarity on sector leadership matters with responsibilities divided across TNA, the Welsh Government and sector bodies. • Extent and scope of delivery for additional Wales focused services unclear. • Wales would remain the only UK home nation without its own distinct national archive body; risk that this approach may be seen as a 'token' gesture.
Viability	Creating the Infrastructure	<ul style="list-style-type: none"> • No capital investment required; physical and digital infrastructure for managing the Welsh public record would continue to be provided by TNA at no charge to the Welsh Government. • Resources required to develop new services to enhance access with a Welsh focus – e.g. additional staff with archival expertise, knowledge of the Welsh documentary context, and Welsh language skills – this process could be complex, time-consuming and costly. Costs would need to be met from Welsh Government budgets, and would be dependent on extent and scope of planned services. • Potential issues with direction of Welsh Government funding to a UK Government non-ministerial department (TNA) regarding development and delivery of new services.
	Maintaining the Service	<ul style="list-style-type: none"> • Revenue costs for maintaining infrastructure and services for the general management of the Welsh public record and delivery of access would continue to be provided by TNA at no charge to the Welsh Government. • Continued input from the Welsh Government's Museums Archives and Libraries Division regarding support for wider archive sector in Wales; cost neutral. • Additional funding to maintain and continue to develop new services to enhance access with a Welsh focus. Costs would need to be met from Welsh Government budgets, and would be dependent on extent and scope of planned services. • Potential issues with direction of Welsh Government funding to a UK Government non-ministerial department (TNA) regarding maintenance and development of new services.

Feasibility	Dependencies	<ul style="list-style-type: none"> No legislative change required; arrangements would continue to operate in accordance with the Government of Wales Act 2006 and the Public Records Act 1958. No requirements regarding transfer of custody for records, property or staff.
	Logistics	<ul style="list-style-type: none"> No changes to governance arrangements / administrative structures; arrangements would continue to operate in accordance with the Public Records Act 1958 and the Concordat between TNA and the Welsh Government. Timescales: development period for identifying, creating, piloting and delivering suitable 'Welsh' focused resources, 2-5 years.

Strengths	Weaknesses
<ul style="list-style-type: none"> This is the quickest solution to the delivery of national archive functions for Wales, with the lowest risk and cost No disruption, uncertainty or expense from establishing a new institution Management of the Welsh public record provided at no cost to the Welsh Government Continued benefits of TNA's expert knowledge and practice New digital services could widen access with a Welsh focus 	<ul style="list-style-type: none"> Welsh records would be preserved by a London-based institution (albeit with an English and Welsh remit for public records and wider UK role); no physical services would be delivered in Wales Does not provide the cultural focus or identity of a Welsh national institution; Wales would remain the only UK home nation without a distinct national archive Could create artificial divisions between 'UK' and 'Welsh' records which hinder access and understanding New digital services would widen access with a Welsh focus, but at an <i>additional cost</i> to the Welsh Government; development of these services could be complex and expensive No additional benefits to the wider archive sector in Wales

Model 2: A Welsh Public Record Office

Establishment of a public record office for Wales with responsibilities focused on collection, management and access to Welsh Government records, and those of other designated 'Welsh public record' bodies.

	Assessment Criteria	Rationale / Comments
Desirability	Securing the Welsh Public Record	<ul style="list-style-type: none"> • Responsible for Welsh public records as designated by the Government of Wales Act 2006; TNA would remain responsible for the non-devolved public record in Wales. • Potential to review the definition of public records / what should constitute the national record. • No responsibilities or capacity for securing non-public records in the national interest. • With suitable resources, arrangements for securing and preserving the Welsh public record should be equivalent to those provided under current provision by TNA. • Records would stay within Wales; removing any potential disruption or risk from transfer to TNA. • Potential risk over the transition period; may require continued involvement from TNA until new body is fully piloted and operational.
	Accessing the Welsh Public Record	<ul style="list-style-type: none"> • Research audiences and the general public would be able to physically access the Welsh public record within Wales; access staff expertise / support in Welsh records, history and culture. • Access for record creators should be improved; physical location within Wales enabling closer relationships with Welsh public record bodies. • Welsh public records would be divorced from the wider UK documentary context including pre-devolution records relating to Wales which would remain with TNA. • With suitable resources, appropriate access facilities and services (onsite, remote and online) could be developed; access services would comply with Welsh language standards.

	Wider Benefit	<ul style="list-style-type: none"> • Support for the wider archive sector in Wales would remain on the basis of the services provided through TNA (under a reduced remit) and the Welsh Government's Museums Archives and Libraries Division. • Additional lack of clarity on sector leadership / public record matters with responsibilities divided across the Welsh Government, TNA, and sector bodies; productive relationship with TNA would still be required to liaise over the management of non-devolved public records held in Wales. • No additional benefits for securing the wider documentary heritage of Wales; role purely focused on the Welsh public record. • Establishes a distinct national archive body for Wales, demonstrating parity with other UK home nations, although with a narrower remit than in Scotland and Northern Ireland (no oversight of local government recordkeeping).
Viability	Creating the Infrastructure	<ul style="list-style-type: none"> • Planning and development would require significant input of relevant knowledge and skills (staffing and consultancy) covering: public records legislation; archive building standards and design; digital preservation systems; public service delivery; information legislation compliance. • Capital investment required: construction of a standards-compliant, high profile archive building c. £15-20 million. • Digital preservation system development: systems and staffing c. £9 million over 5 years for standalone system. Complex and costly to establish; may take several years to create foundation system and will require on-going development. Consideration could be given to potential partnerships with other national-level providers (TNA or National Records of Scotland). • Potential costs associated with transfer of Welsh public records already held at TNA would also need to be met from Welsh Government budgets.
	Maintaining the Service	<ul style="list-style-type: none"> • Service delivery would require relevant knowledge and skills covering: business planning and financial management; building management; archive collection management; digital preservation; physical conservation; public service delivery; public records legislation; information legislation compliance.

		<ul style="list-style-type: none"> Revenue operating costs: building management and maintenance; IT infrastructure; supplies and services; public engagement (onsite, remotely, online); staffing (excluding digital preservation) – dependent on scale of operations / type of building, likely minimum cost c. £2.1 million p.a. Digital preservation system maintenance and development: systems and staffing, likely minimum cost c. £1.8 million p.a. for standalone system.
Feasibility	Dependencies	<ul style="list-style-type: none"> An Order by the UK Secretary of State to invoke s.147 of the Government of Wales Act 2006. New legislation passed by the Welsh Government to create the organisation and provide for the management of Welsh public records. Consultation with TNA regarding transfer of Welsh public records already held by TNA.
	Logistics	<ul style="list-style-type: none"> Legislation would need to establish governance structures, roles and responsibilities, and reporting mechanisms – establishing the formal relationship between the Welsh Government and the new body. Timescales: development period 6-10 years – Ministerial Order / Legislation (1-2 years); development of built accommodation (c. 3 years); establishment of digital preservation systems (c. 5 years); concurrent staff recruitment, establishment of wider IT systems.

Strengths	Weaknesses
<ul style="list-style-type: none"> Provides the cultural focus / identity of a Welsh national institution; a degree of parity with other UK home nations Physical services would be delivered within Wales 	<ul style="list-style-type: none"> Limited option, which requires legislative change, and significant investment, but without delivering wider benefits for Wales documentary heritage / the wider archive sector Prosaic nature of collections (modern records) unlikely to capture public imagination

Model 3: A National Archive – oversight of public sector recordkeeping; archive sector leadership

Establishment of a National Archive for Wales with responsibilities focused on collection, management and access to Welsh public records, statutory powers to oversee recordkeeping in local authorities, and a leadership role for the wider archive sector.

	Assessment Criteria	Rationale / Comments
Desirability	Securing the Welsh Public Record	<ul style="list-style-type: none"> • Responsible for Welsh public records as designated by the Government of Wales Act 2006; TNA would remain responsible for the non-devolved public record in Wales. • Potential to review the definition of public records / what should constitute the national record. • Potential to include permissive capacity for securing non-public records in the national interest. • With suitable resources, arrangements for securing and preserving the Welsh public record should be equivalent to those provided under current provision by TNA. • Records would stay within Wales; removing any potential disruption or risk from transfer to TNA. • Potential risk over the transition period; may require continued involvement from TNA until new body is fully piloted and operational.
	Accessing the Welsh Public Record	<ul style="list-style-type: none"> • Research audiences and the general public would be able to physically access the Welsh public record within Wales; access staff expertise / support in Welsh records, history and culture. • Potential to widen the collecting remit in the national interest, increasing the relevance and interest of collections; this could however give rise to confusion over the respective roles of the new body and other national institutions such as the National Library of Wales. • Access for record creators should be improved; physical location within Wales enabling closer relationships with Welsh public record bodies. • Welsh public records would be divorced from the wider UK documentary context including pre-devolution records relating to Wales which would remain with TNA. • With suitable resources, appropriate access facilities and services (onsite, remote and online) could be developed; access services would comply with Welsh language standards.

	Wider Benefit	<ul style="list-style-type: none"> • National body with the remit, profile and knowledge to lead and advocate for the Welsh archive sector. • Potential lack of clarity on public record matters with responsibilities divided across the Welsh Government and TNA; productive relationship with TNA would still be required to liaise over the management of non-devolved public records held in Wales. • Vehicle for securing the wider documentary heritage of Wales; potential to coordinate national programmes and a cohesive national vision for the Welsh archive sector. • Establishes a distinct national archive body for Wales, demonstrating parity with other UK home nations, with an equivalent remit to other UK national archive institutions.
Viability	Creating the Infrastructure	<ul style="list-style-type: none"> • Planning and development would require significant input of relevant knowledge and skills (staffing and consultancy) covering: public records legislation; archive building standards and design; digital preservation systems; public service delivery; information legislation compliance; stakeholder engagement. • Capital investment required: construction of a standards-compliant, high profile archive building c. £15-20 million. • Digital preservation system development: systems and staffing c. £9 million over 5 years for standalone system. Complex and costly to establish; may take several years to create foundation system and will require on-going development. Consideration could be given to potential partnerships with other national-level providers (TNA or National Records of Scotland). • Potential costs associated with transfer of Welsh public records already held at TNA would also need to be met from Welsh Government budgets.
	Maintaining the Service	<ul style="list-style-type: none"> • Service delivery would require relevant knowledge and skills covering: business planning and financial management; building management; archive collection management; digital preservation; physical conservation; public service delivery; public records legislation; information legislation compliance; relationship management with sector stakeholders.

		<ul style="list-style-type: none"> Revenue operating costs: building management and maintenance; IT infrastructure; supplies and services; sector engagement and support; public engagement (onsite, remotely, online); staffing (excluding digital preservation) – dependent on scale of operations / type of building, likely minimum cost c. £2.3 million p.a. Digital preservation system maintenance and development: systems and staffing, likely minimum cost c. £1.8 million p.a. for standalone system.
Feasibility	Dependencies	<ul style="list-style-type: none"> An Order by the UK Secretary of State to invoke s.147 of the Government of Wales Act 2006. New legislation passed by the Welsh Government to create the organisation and provide for the management of Welsh public records, for a sector leadership role, and for oversight of recordkeeping in local government and the wider public sector. Consultation with TNA regarding transfer of Welsh public records already held by TNA. Consultation with local government and other public bodies regarding process for oversight of recordkeeping functions.
	Logistics	<ul style="list-style-type: none"> Legislation would need to establish governance structures, roles and responsibilities, and reporting mechanisms – establishing the formal relationship between the Welsh Government and the new body, and reporting arrangements relating to oversight of public sector recordkeeping. Timescales: development period 6-10 years – Ministerial Order / Legislation (1-2 years); development of built accommodation (c. 3 years); establishment of digital preservation systems (c. 5 years); concurrent staff recruitment, establishment of wider IT systems.

Strengths	Weaknesses
<ul style="list-style-type: none"> Provides the cultural focus / identity of a Welsh national institution; increases parity with other UK home nations Physical services would be delivered within Wales Assists in securing the wider documentary heritage of Wales, and adds value in terms of leadership and support for the archive sector 	<ul style="list-style-type: none"> More complex option, requiring legislative change, and significant investment Prosaic nature of collections (modern records) unlikely to capture public imagination

Model 4: A National Archive – oversight of public sector recordkeeping; archive sector leadership; and central service provision

Establishment of a National Archive for Wales with responsibilities for the management of Welsh public records, statutory powers to oversee recordkeeping in local authorities, and a leadership role for the archive sector, including delivery of central support services.

	Assessment Criteria	Rationale / Comments
Desirability	Securing the Welsh Public Record	<ul style="list-style-type: none"> Responsible for Welsh public records as designated by the Government of Wales Act 2006; TNA would remain responsible for the non-devolved public record in Wales. Potential to review the definition of public records / what should constitute the national record. Potential to include permissive capacity for securing non-public records in the national interest. With suitable resources, arrangements for securing and preserving the Welsh public record should be equivalent to those provided under current provision by TNA. Records would stay within Wales, removing any potential disruption or risk from transfer to TNA. Potential risk over the transition period; may require continued involvement from TNA until new body is fully piloted and operational.
	Accessing the Welsh Public Record	<ul style="list-style-type: none"> Research audiences and the general public would be able to physically access the Welsh public record within Wales; access staff expertise / support in Welsh records, history and culture. Potential to widen the collecting remit in the national interest, increasing the relevance and interest of collections; this could however give rise to confusion over the respective roles of the new body and other national institutions such as the National Library of Wales. Access for record creators should be improved; physical location within Wales enabling closer relationships with Welsh public record bodies and other record creators. Welsh public records would be divorced from the wider UK documentary context including pre-devolution records relating to Wales which would remain with TNA. With suitable resources, appropriate access facilities and services (onsite, remote and online) could be developed; access services would comply with Welsh language standards.

	Wider Benefit	<ul style="list-style-type: none"> • National body with the remit, profile and knowledge to lead and advocate for the Welsh archive sector; direct sector support through the provision of central services, e.g. in securing the national digital record. • Potential lack of clarity on public record matters with responsibilities divided across the Welsh Government and TNA; productive relationship with TNA would still be required to liaise over the management of non-devolved public records held in Wales. • Vehicle for securing the wider documentary heritage of Wales; potential to coordinate national programmes and a cohesive national vision for the Welsh archive sector. • Establishes a distinct national archive body for Wales, demonstrating parity with other UK home nations, with a delivery model in advance of that of other UK national archive institutions.
Viability	Creating the Infrastructure	<ul style="list-style-type: none"> • Planning and development would require significant input of relevant knowledge and skills (staffing and consultancy) covering: public records legislation; archive building standards and design; digital preservation systems; public service delivery; information legislation compliance; stakeholder engagement. • Capital investment required: construction of a standards-compliant, high profile archive building c. £15-20 million. • Digital preservation system development: systems and staffing c. £9 million over 5 years for standalone system. Complex and costly to establish; may take several years to create foundation system and will require on-going development. Consideration could be given to potential partnerships with other national-level providers (TNA or National Records of Scotland). • Potential costs associated with transfer of Welsh public records already held at TNA would also need to be met from Welsh Government budgets.
	Maintaining the Service	<ul style="list-style-type: none"> • Service delivery would require relevant knowledge and skills covering: business planning and financial management; building management; archive collection management; digital preservation; physical conservation; public service delivery; public records legislation; information legislation compliance; relationship management with sector stakeholders; central service delivery and management. • Revenue operating costs: building management and maintenance; IT infrastructure; supplies and services; sector engagement and support; public engagement (onsite, remotely, online); staffing

		<p>(excluding digital preservation) – dependent on scale of operations / type of building, likely minimum cost c. £2.5 million p.a.</p> <ul style="list-style-type: none"> Digital preservation system maintenance and development: systems and staffing, likely minimum cost c. £1.8 million p.a. for standalone system. The extension of provision to support the wider archive sector would involve additional costs, which cannot be quantified at this stage.
Feasibility	Dependencies	<ul style="list-style-type: none"> An Order by the UK Secretary of State to invoke s.147 of the Government of Wales Act 2006. New legislation passed by the Welsh Government to create the organisation and provide for the management of Welsh public records, for a sector leadership role including the delivery of central services, and for oversight of recordkeeping in local government and the wider public sector. Consultation with TNA regarding transfer of Welsh public records already held by TNA. Consultation with local government and other public bodies regarding process for oversight of recordkeeping functions.
	Logistics	<ul style="list-style-type: none"> Legislation would need to establish governance structures, roles and responsibilities, and reporting mechanisms – establishing the formal relationship between the Welsh Government and the new body, and reporting arrangements relating to oversight of public sector recordkeeping. Timescales: development period 6-10 years – Ministerial Order / Legislation (1-2 years); development of built accommodation (c. 3 years); establishment of digital preservation systems (c. 5 years); concurrent staff recruitment, establishment of wider IT systems.

Strengths	Weaknesses
<ul style="list-style-type: none"> Provides the cultural focus / identity of a Welsh national institution; delivery model in advance of that of other UK home nations Physical services would be delivered within Wales Assists in securing the wider documentary heritage of Wales, and adds value in terms of leadership and real practical support for the archive sector 	<ul style="list-style-type: none"> Further increased complexity, requiring legislative change, and significant additional investment Potential to impact adversely on the resourcing of other national institutions

Model 5: A National Archive System – oversight of public sector recordkeeping; local archive service delivery

Establishment of a new National Archive System constituting local authority record offices as part of a Wales-wide system alongside a central national archive. Responsibilities including management of Welsh public records, and oversight of recordkeeping in local authorities.

	Assessment Criteria	Rationale / Comments
Desirability	Securing the Welsh Public Record	<ul style="list-style-type: none"> Responsible for Welsh public records as designated by the Government of Wales Act 2006; TNA would remain responsible for the non-devolved public record in Wales; potential to review the definition of public records / what should constitute the national record. Wide remit across the whole of the Welsh documentary heritage, encompassing local collections generated by the full range of potential record creators; securing a truly national record. With suitable resources, arrangements for securing and preserving collections should be equivalent to those provided under current provision by TNA. Records would stay within Wales, removing any potential disruption or risk from transfer to TNA. Potential risk over the transition period; may require continued involvement from TNA until new body is fully piloted and operational.
	Accessing the Welsh Public Record	<ul style="list-style-type: none"> Research audiences and the general public would be able to physically access the Welsh national record within Wales at a location convenient to them; access staff expertise / support in Welsh records, history and culture. Potential to equalise the service 'offer' / quality of services, across Wales; reducing variability in local provision, and ensuring the sustainability of local / regional services. Wide collecting remit, increasing the relevance and interest of collections, and creating a truly national record; potential for nationwide access programmes covering the Welsh public record and local collections. Potential risk to provision for local culture and history from development of an archival 'monoculture'; weakening local collecting, and rationalising local access points.

		<ul style="list-style-type: none"> • Access for record creators should be improved; physical location within Wales enabling closer relationships with Welsh public record bodies and other record creators. • Welsh public records would be divorced from the wider UK documentary context including pre-devolution records relating to Wales which would remain with TNA. • With suitable resources, appropriate all-Wales access facilities and services (onsite, remote and online) could be developed; access services would comply with Welsh language standards.
	Wider Benefit	<ul style="list-style-type: none"> • National system with the remit, profile and knowledge to deliver a national service across Wales. • Potential lack of clarity on public record matters with responsibilities divided across the Welsh Government and TNA; productive relationship with TNA would still be required to liaise over the management of non-devolved public records held in Wales. • Potential issues with regard to ownership and ultimate responsibility for local authority collections and deposited material; risk that transfer of local services into a national body would be politically unacceptable at a local level. • Vehicle for securing and providing access to the wider documentary heritage of Wales; potential to coordinate national programmes and a cohesive national vision for Welsh archive provision. • Establishes a distinct national archive body for Wales, demonstrating parity with other UK home nations, with an innovative and unique delivery model in advance of that of other UK national archive institutions.
Viability	Creating the Infrastructure	<ul style="list-style-type: none"> • Planning and development would require significant input of relevant knowledge and skills (staffing and consultancy) covering: public records legislation; archive building standards and design; digital preservation systems; public service delivery; information legislation compliance; stakeholder engagement. • Capital investment required: construction of a standards-compliant, high profile archive building c. £15-20 million. • Additional capital costs associated with potential transfer of property (local authority archive buildings) into the national organisation; not possible to quantify at this stage.

		<ul style="list-style-type: none"> • Digital preservation system development: systems and staffing c. £9 million over 5 years for standalone system. Complex and costly to establish; may take several years to create foundation system and will require on-going development. Consideration could be given to potential partnerships with other national-level providers (TNA or National Records of Scotland). • Potential costs associated with transfer of Welsh public records already held at TNA would also need to be met from Welsh Government budgets.
	Maintaining the Service	<ul style="list-style-type: none"> • Service delivery would require relevant knowledge and skills covering: business planning and financial management; building management; archive collection management; digital preservation; physical conservation; public service delivery; public records legislation; information legislation compliance; relationship management with sector stakeholders; central service delivery and management. • Revenue operating costs: building management and maintenance; IT infrastructure; supplies and services; sector engagement and support; public engagement (onsite, remotely, online); staffing (excluding digital preservation) – dependent on scale of operations / type of building, likely minimum cost c. £2.5 million p.a. • Additional revenue costs for maintaining a network of local offices across Wales, collecting, preserving and providing access to local collections; revenue expenditure reported to CIPFA indicates that this would be in the order of £5 million p.a. based on the current network. • Digital preservation system maintenance and development: systems and staffing, likely minimum cost c. £1.8 million p.a. for standalone system. The extension of provision to support digital preservation across the local network would involve additional costs, which cannot be quantified at this stage.
Feasibility	Dependencies	<ul style="list-style-type: none"> • An Order by the UK Secretary of State to invoke s.147 of the Government of Wales Act 2006. • New legislation passed by the Welsh Government to create the organisation and provide for the management of Welsh public records, for bringing local authority services within national arrangements, and for oversight of recordkeeping in local government and the wider public sector. • Possible amendments to Local Government (Wales) Act 1994 s.60 as it relates to local archive provision. • Consultation with TNA regarding transfer of Welsh public records already held by TNA.

		<ul style="list-style-type: none"> • Consultation with local government and other public bodies regarding process for oversight of recordkeeping functions, and integration of local authority services into a national organisation.
	Logistics	<ul style="list-style-type: none"> • Legislation would need to establish governance structures, roles and responsibilities, and reporting mechanisms – establishing the formal relationship between the Welsh Government and the new body, reporting arrangements relating to oversight of public sector recordkeeping, and responsibilities and operational relationships with local authorities relating to local archive services. • Timescales: development period 6-10 years – Ministerial Order / Legislation (1-2 years); development of built accommodation (c. 3 years); establishment of digital preservation systems (c. 5 years); concurrent staff recruitment, establishment of wider IT systems.

Strengths	Weaknesses
<ul style="list-style-type: none"> • Provides the cultural focus / identity of a Welsh national archival system, encompassing a central national body, and local service points; unique and ambitious delivery model in advance of that of other UK home nations • Physical services would be delivered within Wales; model enables equality of service provision across Wales, sustaining local services • Secures the truly national documentary heritage of Wales, with a delivery model which is linked up across the country 	<ul style="list-style-type: none"> • Hugely complex and the most costly of all the models, requiring significant additional investment and a long time-frame • Requires legislative change, and transfer of custody of property and records • Potentially not acceptable at local political level

Appendix 1: Comparator National Archive Services

The National Archives (TNA)	
Model	National archive with additional functions (e.g. Queen's Printer); one physical service point; leadership role for the archive sector in England; records management oversight in central government only.
Profile of collections	Over 11 million documents (analogue and digital formats), comprising the records of central Government from the C11th onwards.
Number of staff	539 FTE covering all TNA responsibilities, not just archival duties.
Budget	£44.3m total expenditure of which staff were £24.8m; raised £9.2m through income from sale of goods and services including the sale of copies of documents and publications, reproduction fees and licensing. (Annual Report and Accounts 2017-18).
Background	Created in 2003 by combining the Public Record Office (est. 1838) and the Historical Manuscripts Commission; from 2006, incorporated the Office of Public Sector Information (OPSI) including Her Majesty's Stationery Office (HMSO). Took over responsibility for sector lead for archives in England in 2012, when the Museums, Libraries and Archives Council was dissolved.
Legal basis	Public Records Act 1958; non-ministerial department reporting to the Minister of State for digital policy.
Key features of the archival functions	<ul style="list-style-type: none"> • National archive for the United Kingdom, England and Wales • CEO is The Keeper of Public records; supported by an Advisory Council • No oversight of record keeping activity outside of central government; advisory role on records / information management for wider public sector recordkeeping, including reuse of public sector information • Inspects and appoints Places of Deposit to hold public records on behalf of TNA in England and Wales • Archive sector lead in England; advisory role on archival management; partner and scheme manager for Archive Service Accreditation; supports research and development work, and collaborates widely on the development of best practice. • Collaborates with other UK national archives / cultural institutions on areas of mutual interest, e.g. digital preservation.
Accommodation	Single purpose-built site (1977) at Kew (public access, storage, staff facilities). Additional storage at Deepstore in Cheshire.
Digital preservation capability	A world leader with 20 years' experience of digital developments, including several internationally recognised digital preservation tools: DROID (format recognition) and PRONOM (file format registry), and the CSV Validator. Maintains an in-house digital preservation system, under constant development as the complexity and scale of technological challenges grows. Challenges in terms of recruiting / retaining appropriately skilled staff.

Isle of Man Public Record Office	
Model	Public record office with additional collecting responsibilities; one physical service point; archive service for Isle of Man (mainly public records); records management advice to public record bodies.
Profile of collections	Records of the Isle of Man parliament and government departments / organisations; local authority records; records of courts and other local public record bodies – dating from 1800 to the present day.
Number of staff	6 FTE
Budget	Modest operational budget as part of the Isle of Man Central Registry.
Background	Established in the 1990s as part of the General Registry. Prior to its establishment public records were preserved by the Manx National Heritage Library and Archives; the Manx National Heritage Library continues to hold some public records and all other Manx archives, including business and personal papers and sources for family history research.
Legal basis	Public Records Act 1999; Public Records Order 2015; part of the Central Registry function within the Department for Enterprise.
Key features of the archival functions	<ul style="list-style-type: none"> • Record office for the Isle of Man • Under the charge of the Chief Registrar • Preserves records of the Isle of Man government and other Manx public bodies that are of historical and cultural significance • Powers to inspect and examine all public records; works actively with public bodies to provide advice and guidance • Assesses all Places of Deposit before designation to hold public records on its behalf to ensure they meet suitable standards • Collaborates with other Manx cultural institutions to ensure appropriate preservation of the Island's national memory
Accommodation	Single site adapted from a light industrial unit (public access, storage, staff facilities).
Digital preservation capability	Small-scale operation; developing policies and strategies for the collating, preserving and storing digital archives.

National Records of Scotland (NRS)	
Model	National archive with additional functions (e.g. government statistics); one physical service point; no formal archive sector lead role but directs funding to other bodies; statutory oversight of records management in central government and local authorities.
Profile of collections	c.80 linear km analogue records (90% public records); c.20TB of born-digital in a digital preservation system, plus 700TB of digitized material; holdings comprise the records of the Scottish Government and court system, and some private records of national significance, dating from the C12th onwards.
Number of staff	c.450 FTE covering all NRS responsibilities; c.50 are directly involved in the archival function, but with other staff in support roles.
Budget	Operating budget £34.3m; Capital budget £2.9m. (2018/19 Autumn Budget Revision).
Background	Created in 2011 by combining the National Archives of Scotland and the General Register Office for Scotland. Predecessor bodies and activity date back to the C13th, with the formal establishment of the first official repository in the C18th.
Legal basis	Public Records (Scotland) Act 1937; National Heritage (Scotland) Act 1985 (provision for non-public records); Public Records (Scotland) Act 2011 (oversight of local authority records management); non-ministerial office of the Scottish Government.
Key features of the archival functions	<ul style="list-style-type: none"> • National archive for Scotland • CEO is The Keeper of the Records of Scotland; no Advisory Council • Oversight of record keeping by public authorities under the Public Records (Scotland) Act 2011; public authorities are required to publish a Records Management Plan which must be approved by the Keeper; widely considered to have been successful in improving the quality of local records and information management • No formal archive sector lead role, directs funding to Scottish Council on Archives; Archive Service Accreditation partner • Collaborates with other UK national archives / cultural institutions on areas of mutual interest (including collecting activity within Scotland); works with partner organisations and the sector to share experience and learning
Accommodation	Operates from three sites in Edinburgh: General / New Register House (public access, storage and staff facilities); West Register House (storage and staff facilities); Thomas Thomson House (storage and staff facilities – access by appointment).
Digital preservation capability	Actively developing its digital preservation capacity, but does not yet have an operational system; challenges in terms of recruiting and retaining appropriately skilled staff.

Public Record Office of Northern Ireland (PRONI)	
Model	Combined national archive, county record office and national manuscript library; one physical service point; no formal archive sector lead role (most archive sector roles fulfilled by PRONI); advisory role in local authority records management.
Profile of collections	c.30 million analogue records (equating to 55-60 linear km); digital holdings of around 1% equivalent; comprising the records of the devolved Northern Ireland government, local authority records and private records, dating from the C13th onwards.
Number of staff	72.5 FTE permanent staff; temporary project staff recruited as appropriate.
Budget	£1.2m (excluding staff, where cost is covered by Communities Department budget); no income generation.
Background	Established in 1923 under the Public Records (Northern Ireland) Act as the place of deposit for public records; the Act also permitted PRONI to accept records from private sources.
Legal basis	Public Records (Northern Ireland) Act 1923; operates as part of the Department for Communities within the Northern Ireland Civil Service.
Key features of the archival functions	<ul style="list-style-type: none"> • National archive, county record office and manuscript library for Northern Ireland • Under the charge of the Minister for Finance; Deputy Keeper (Chief Record Keeper) appointed by Minister; no advisory body • Advisory role for local authority records management • Archive sector lead role not relevant to Northern Ireland context; Archive Service Accreditation partner • Collaborates with other UK national archives / cultural institutions on areas of mutual interest e.g. digital preservation; works with other archival, heritage and cultural bodies in Northern Ireland to promote the importance of archives in society
Accommodation	Operates from a new purpose-built site in the Titanic Quarter of Belfast, opened in 2011 at a cost of £29m (public access, storage and staff facilities).
Digital preservation capability	Some digital preservation capacity, and a small number of digital collections; systems need developing to operate at scale in dealing with the high volume of records that will be generated by the devolved government.

National Archives of Ireland (NAI)	
Model	National archive; one physical service point; no formal archive sector lead role; advisory role for records management in government departments / public service bodies.
Profile of collections	c.100 linear km of analogue records (mostly public records); no digital holdings; comprising the records of Government Departments and their agencies, and records of the preceding British administration; private collections are held where they complement existing holdings; dating from early C19th onwards.
Number of staff	c. 50 FTE; recognises need to expand staffing basis (to c.75) to enable delivery of digital preservation, outreach and education programmes.
Budget	Operating budget (2016) of €1.55m (c.£1.4m). (Report of the Director of the National Archives, 2016) N.B. Costs do not include digital preservation and are for management of analogue collections only.
Background	Established in 1988 under the National Archives Act to preserve the public record of Ireland ; NAI is the successor to the State Paper Office (founded 1702) and the Public Record Office of Ireland (founded 1867) which were amalgamated into the new body.
Legal basis	National Archives Act 1986; under the aegis of the Department of Culture, Heritage and the Gaeltacht.
Key features of the archival functions	<ul style="list-style-type: none"> • National archive for Ireland • Responsible to the Minister for Culture, Heritage and the Gaeltacht; Director appointed by Minister; supported by an Advisory Council • Advisory role to government departments and public service bodies on records management • No formal archive sector lead role, but maintains professional relationships and provides some sector support / professional leadership • Member of the Council of National Cultural Institutions as are the Directors of other national bodies; participates actively in international activity including the International Council on Archives and European Archives Group • Operates in English and Irish (Gaeilge)
Accommodation	Operates from two buildings in central Dublin (one storage only); currently planning for repository refurbishment and storage extension; emphasis on digitisation as a means of meeting public access demands.
Digital preservation capability	Digital preservation systems not fully established; working with government departments to develop understanding of digital preservation needs in government.

Archives New Zealand (ANZ)	
Model	National archive operating from four physical service points across New Zealand; statutory oversight of records management in local authorities; in law is permitted to have an archive sector leadership role, but has not to date taken this up.
Profile of collections	c. 144 linear km analogue records across the four regional offices (c. 144,000 collections / 8 million items); digital holdings of over 120TB (4.4TB born-digital); collections comprise the records of government only from the early C19th onwards.
Number of staff	137.9 FTE permanent staff across all four offices; most are based at head office in Wellington.
Budget	Operating budget (2018) of NZ\$33.9m (£17.8m).
Background	ANZ is the success to the former National Archives (established under the Archives Act 1957); its role was extended by the Public Records Act 2005, including additional powers for the Chief Archives, and a leadership role for recordkeeping throughout central and local government.
Legal basis	Public Records Act 2005; operates as part of the Department of Internal Affairs, but previously had been a separate government department in its own right.
Key features of the archival functions	<ul style="list-style-type: none"> • National archive for New Zealand • Led by the Chief Archivist who is appointed by the Chief Executive of the responsible department (Department of Internal Affairs), but acts independently of the Minister / Chief Executive; an appointed Archives Council advises the Minister • Leadership role in public recordkeeping; oversight of the management of public records and archives; regulatory role for local authority recordkeeping with powers to protect certain local authority records • Powers to exercise a leadership role for the archive sector in New Zealand • Collaborates with Government Information Services and the National Library of New Zealand to ensure effective access to information, and with public and private sector agencies to widen access to public archives online • Operates in English and Maori; Maori culture is integral to its ethos and treatment of New Zealand history
Accommodation	Operates from four regional sites across New Zealand (Wellington, Auckland, Christchurch, Dunedin), with headquarters in Wellington. All sites provide public access, storage and staff facilities; spreading the risk to holdings from seismic activity.
Digital preservation capability	Actively developing its digital preservation capacity, particular with regard to digital transfers from government departments.

Library and Archives Canada (LAC)	
Model	Combined national archive and library; one physical service point; limited records management role for central government only.
Profile of collections	Extensive collection of public and private records, including 250 linear km of government and private textual records, books, newspapers, artworks, sheet music, plans, maps, and photographic / AV material; 5000TB of information in electronic format.
Number of staff	c. 1000 FTE covering all LAC responsibilities; c.600 are directly involved in the archival function.
Budget	Operating budget of \$130m p.a. (c.£75.3m); archival functions account for 2/3 of the budget.
Background	LAC was established in 2004 by combining the functions of the National Archives of Canada (founded as the Dominion Archives in 1872), and the National Library of Canada (founded in 1953). The merger was undertaken to achieve economies of scale (the organisation has been subject to a 20% cut in its budget since 2006, resulting in a reduction in some services) and to enable easier access by combining collections in one institution. Operational mergers of facilities have generally worked well; professionally LAC has retained two professional staff cadres, with distinct branches for archive and library functions.
Legal basis	Library and Archives of Canada Act 2004; reports to the Canadian Parliament through the Minister of Canadian Heritage.
Key features of the archival functions	<ul style="list-style-type: none"> • National archive and library for Canada • Under the direction of the Librarian and Archivist of Canada; supported by an Advisory Council • Repository for government records and powers to facilitate information management in government bodies, but limited practical involvement in government record keeping practice; no oversight of record keeping outside central government • No archive sector lead role; very strong provincial archive services and networks • Collaborates with the network of Canadian Archives (public and private), advocating for good practice; MoUs with other national archives to work on areas of mutual interest (e.g. with TNA on archival databases) • Operates in English and French; working with indigenous peoples to develop services in indigenous languages
Accommodation	Main site in Ottawa built in 1967 and now outdated; new replacement building planned. Three additional service points in Halifax, Vancouver, and Winnipeg (only two of which hold collections and where access is by appointment). The Preservation Centre in Gatineau, opened in 1997 at a cost of \$107m (£62m), provides for the long-term storage and preservation of collections; a new high density storage facility is due to be added opening in 2021.
Digital preservation capability	Digital transformation is a strategic focus for LAC with large scale in-house digitisation capacity and programming; digital preservation is an identified priority but LAC faces challenges in securing the necessary infrastructure and expertise.

National Archives of Australia (NAA)	
Model	National archive; network of repositories and service points across Australia; no wider recordkeeping / sector lead role.
Profile of collections	c.40 million items (analogue and digital, plus extensive AV collections) equating to 380 linear km analogue records; c.5000TB digital collections; collections comprise the records of government, and the personal records of significant figures closely associated with the government in an official capacity (Commonwealth persons).
Number of staff	c. 340 FTE staff.
Budget	Operational Budget ASD\$65m (£35.7m) p.a.
Background	Established under the Archives Act 1983, which formalised the position of the then Australian Archives (previously the Commonwealth Archives Office, established in 1961 when the Archives Division of the National Library gained independence). Name formally changed to National Archives of Australia in 1998.
Legal basis	Archives Act 1983; operates as an executive agency of the Australian Government reporting to the Attorney-General.
Key features of the archival functions	<ul style="list-style-type: none"> • National archive for Australia • Led by an appointed Director-General; supported by an Advisory Council • Repository for government records and the personal records of Commonwealth persons; responsibility for promoting good records management by Australian Government agencies; no wider oversight of record keeping • No formal leadership role for wider archive sector; engages with sector as a professional partner • Collaborates with other Australasian Archives through the Council of Australasian Archives and Records Authorities (CAARA), which includes NAA, ANZ, and the archive authorities of the Australian States and Territories.
Accommodation	Main site in Canberra (reading room and galleries), with separate National Archives Preservation Facility (opened in 2018 at a cost of ASD\$64m (£35.2m). Network of seven additional reading rooms across Australia (Adelaide, Brisbane, Darwin, Hobart, Melbourne, Perth) some co-located with state / territory archives or libraries. Nine additional repositories across Australia provide storage facilities for collections.
Digital preservation capability	NAA undertakes digital preservation and recognises these functions as an increasingly integral element of its operations.

Appendix 2: Comparator Public Record / National Archive Legislation

Public Records Act 1958 (United Kingdom)¹²

Introductory Text

1. General responsibility of the Secretary of State for public records.
 2. The Public Record Office.
 3. Selection and preservation of public records.
 4. Place of deposit of public records.
 5. Access to public records.
 6. Destruction of public records in Public Record Office or other place of deposit.
 7. Records for which Master of the Rolls remains responsible.
 8. Court records.
 9. Legal validity of public records and authenticated copies.
 10. Interpretation.
 11. Public Record Office Acts to cease to have effect.
 12. Northern Ireland.
 13. Short title, repeals and commencement.
- FIRST SCHEDULE Definition of Public Records

Public Records Act 2005 New Zealand¹³

1. Title
2. Commencement

Part 1 Purpose, other preliminary provisions, and key administrative provisions

Subpart 1—Purpose and other preliminary provisions

3. Purposes of Act
4. Interpretation
5. Variations to application of Act
6. Exclusions from application of Act
7. Treaty of Waitangi (Te Tiriti o Waitangi)
8. Act binds the Crown

Subpart 2—Key administrative provisions

Archives New Zealand (Te Rua Mahara o te Kāwanatanga)

¹² See: <http://www.legislation.gov.uk/ukpga/Eliz2/6-7/51>

¹³ See: <http://www.legislation.govt.nz/act/public/2005/0040/latest/DLM345529.html>

9. Continuation of Archives New Zealand

Chief Archivist

10. Chief Archivist

11. Functions and duties of Chief Archivist

12. Chief Archivist to act independently

13. Delegations by Chief Archivist

Archives Council

14. Archives Council established

15. Function of Archives Council

16. Administrative matters

Part 2 Recordkeeping requirements

Subpart 1—Key duties

17. Requirement to create and maintain records

18. Authority required to dispose of public records and protected records

Subpart 2—Control of public records

Registers

19. Registers

Disposal

20. Authority to dispose of public records

Transfer

21. Mandatory transfer of public records

Deferral of transfer

22. Deferred transfer of public records

23. Transfer of public records

24. Temporary return of public archives to controlling public office

Discharge

25. Discharge of public records

Approved repositories

26. Approval of repositories

Subpart 3—Standards, inspection, reporting, and audit

27. Standards

28. Application and content of standards

29. Inspection powers

30. Exemptions

31. Direction to report to Chief Archivist

32. Annual report on recordkeeping

33. Independent audits of public offices

34. Audit of recordkeeping practices of Chief Archivist

35. Audit reports

Subpart 4—Estray records, prescribed records, protected records, Ministers' papers, and private records

Estray records

36. Inspection of estray records

37. Other requirements for estray records

Prescribed records

38. Prescribed records

39. Acquisition of prescribed records

Protected records of local authorities

40. Protected records of local authorities

41. Transitional provision

Parliamentary records, Ministers' papers, private records, and other records

42. Chief Archivist may accept parliamentary records, Ministers' papers, and private and other records

Part 3 Public access

Determination of access status as open or restricted

43. Requirement to classify access status

44. Basis for determining access status

Access status of local authority records

45. Requirement to classify access status of local authority records

46. Basis for determining access status of local authority records

Open access records

47. Public inspection of open access records

48. Publication or copying of public archives

49. Prohibition on public access or copying

Restricted access records

50. Period for which restricted access may apply

Part 4 Appeal process and miscellaneous provisions

Subpart 1—Appeal process

51. Appeal to Minister by public office or by local authority

52. Commencement of appeal

53. Effect of appeal

54. Process of appeal

55. Recommendation of Archives Council

56. Decision of Minister

Subpart 2—Miscellaneous provisions

57. Application of Copyright Act 1994

58. Application of Official Information Act 1982

59. Charges for services

- 60. Protection of names
 - Offences and penalties*
- 61. Offences
- 62. Penalties
 - Regulation-making power*
- 63. Regulations
 - Savings and transitional provisions*
- 64. Savings
- 65. Transitional provisions
 - Repeals and amendments*
- 66. Repeals
- 67. Amendments to enactments

National Archives Of South Africa Act 1996¹⁴

- Definitions
- Establishment of National Archives of South Africa
- Objects and functions of National Archives
- National Archivist and staff
- Powers and duties of National Archivist
- Establishment, constitution and functions of National Archives Commission
- Secretary and staff of Commission
- Funds of Commission
- Accountability
- Annual Reports
- Custody and preservation of records
- Access and use
- Management of public records
- Acquisition and management of non-public records
- Limitation of liability
- Offences and penalties
- Transitional provisions
- Regulations
- Repeal of laws
- Short title and commencement

¹⁴ See: https://en.unesco.org/sites/default/files/southafrica_act1996_engorof.pdf

Appendix 3: Indicative Costings

It is not possible to identify definitively what the costs of the various aspects of creating a national archive would be as these costs will be dependent on the scope of the model adopted and decisions regarding how it is to be delivered. However, for this study some broad costings have been developed to give a sense of the scale of costs involved.

- **Capital investment: c.£15-20 million**

Construction of a standards-compliant, high profile archive building

The amount of analogue records that will require accommodation will probably be relatively small – perhaps 20 linear metres accrual for each year for government records. This figure would be higher if the scope of the national archive's functions includes responsibility for collecting additional types of records e.g. records of individual government ministers, or extending to non-public records of national interest. However, physical storage is only one element of the building; other requirements include collection processing areas, staff accommodation, and public spaces (reading room, exhibition space, education and community space).

Cost would also be affected by the level of desire for a landmark building for this national institution. The archive accommodation could range from a modest building and an operation focused primarily on digital delivery (as the vast majority of collections would be digital) to a high profile civic space. If the building were constructed as an environmentally sound construction (as per Herefordshire Record Office's 'Passivhaus' design) this would significantly reduce construction and running costs.

From the experience of other UK archives¹⁵ this report suggests a new build high profile archive building accommodating around 60 staff, one kilometre of analogue collection storage, and attractive public spaces could be in the range of £15 million to £20 million to construct (excluding land purchase).

- **Digital Preservation System: c.£9 million over a 5 year cycle (£1.8 million p.a.)**

Digital preservation system development: systems and staffing

The costings are a very broad-brush indication of the scale of costs involved in establishing and operating a digital preservation system. They are based on an assumed 5 year cycle, with a comparison of own owned infrastructure versus public cloud. The need to review, upgrade and renew systems mean that development requirements are an ongoing cost over each 5 year cycle.

Task / Staffing resource	Commercial Cloud £000s	Own infrastructure £000s
Requirements analysis, development and provisioning cap. ex.	250	250
Infrastructure cap. ex		2500
Infrastructure lease	2000	
Platform Solution Architect (1)	425	425
Platform Systems Administrators (3)	825	825
Platform Management (2 – various grades))	450	450

¹⁵ Public Record Office of Northern Ireland (PRONI) – high profile new build in Titanic Quarter Belfast, opened in 2011 at a cost of £29 million.

IS / CS Analyst (1)	225	225
Software Testing (2)	350	350
Software Developers (4)	1000	1000
Solution Architects (2)	850	850
Web Developers (3)	525	525
Management (5 – various grades)	1200	1200
Marketing, outreach, education (4)	600	600
Total cost over five years (27 staff)	8700	9200

It should be noted that given the records will be primarily digital any new national archive establishment will need to plan to have a large proportion of its staff with expertise in digital technologies. The institution will also need to pay market rates as these skills are in short supply and there is an international demand for skilled staff in this area.

N.B. These costs are speculative and *it is strongly recommended* that any decision to establish a national archive should include a fully costed, detailed specification of the digital preservation function.

- **Revenue operating costs: £2.1-£7.5 million p.a.**

Building management and maintenance; IT infrastructure; supplies and services; sector engagement and support; public engagement (onsite, remotely, online); staffing (excluding digital preservation) – dependent on scale of operations / type of building.

Comparable scales of operation¹⁶ would suggest that a minimum of 30 staff are required (excluding those directly involved in digital preservation, included in the costings above). Dependent on the model adopted additional staffing would be required to deliver the extended functions. The following table shows the costings for each model, assuming an average salary of £30k per FTE (starting salary for an archivist is £27k-£32k with support and para-professional staff on lower salaries). These costs exclude specific digital skills (which are covered above).

Annual non-staff costs based on the annual non-staff budget for the Public Record Office of Northern Ireland (at £1.2 million p.a.) with additional sums for extended functions under each model. For Model 5 figures include the operational costs for the current local authority network (based on 2017/18 CIPFA figures for 8 reporting services at a total cost of £3.5m) – an estimated at £5m p.a. (across the current network of 13 services).

Model	No. Central staff	Central staff cost p.a. £000s	Central non-staff cost p.a. £000s	Satellite service costs p.a. £000s	Total operating cost p.a. £m
2	30	900	1200		2.1
3	35	1050	1250		2.3
4	40	1200	1300		2.5
5	40	1200	1300	5000	7.5

¹⁶ National Records of Scotland (50 archive-related staff); National Archives of Ireland (60 staff); Public Record Office of Northern Ireland (73 permanent staff); Archives New Zealand (138 staff over four locations).