



5 June 2017

Mr. Dave Seglins
Mr. Jeremy McDonald
Canadian Broadcasting Corporation

Dear Mr. Seglins and Mr. McDonald:

We are respectively the Presidents of the Association of Canadian Archivists (ACA) and the Association des archivistes du Québec (AAQ). We are writing to you on behalf of our membership concerning the CBC's investigation into the existence of 'secret archives' across the federal government and the petition of the Canadian Historical Association (CHA).

Established in 1975, the ACA is a national not-for-profit organization representing over 600 archivists in Canada. The Association's mandate is to provide the archival profession leadership and to facilitate an understanding and appreciation of Canada's archival heritage.

Founded in 1967, the Association des archivistes du Québec (AAQ) represents over 600 professionals and technicians from across Canada working in the management of archives throughout their life-cycle in public and private organisations. Their work is essential to ensure the integrity of records and promote transparency of public and private bodies through the sound management of their records and of the information contained in them. These specialists have a unique role to play in the establishment of measures designed to ensure both access to records in public and private bodies and the protection of information that should not be made public for legitimate reasons.

As reported on the Fifth Estate and in a CBC news posting on May 25th, a CBC investigation highlighted the concerns of historians that the federal government was retaining historical records in 'secret archives' purportedly to deny access to the public.

We have no reason to doubt the concerns of the historians who assert that 'secret archives' do exist, and the reputation of the CHA, which supports them, is beyond question. The ACA and the AAQ are in agreement with the CHA's statement that "transparency with regard to information, including historical documents, is essential and important to the proper functioning of a democracy; and that citizens have a right to

access their nation's history by knowing what historical documents the government is in possession of and having open and transparent access to those documents." In light of this statement, we request the government to include in its policy on information management provisions for the declassification of protected and classified records so that history can be documented on the basis of the written evidence. The absence of such evidence can open the door to unsubstantiated 'facts', fabrications, and rumour. The ACA and the AAQ believe that only proper records management practices can ensure the systematic transfer to the public of federal government records of historical significance via Library and Archives Canada. The federal government itself recognized in its Action Plan on Open Government (<http://open.canada.ca/en/content/canadas-action-plan-open-government-2014-16>) that making its information accessible is the basis of an open and democratic dialogue with its citizens.

The mandate of archivists is to control and make accessible the records of our society, so that, among other things, they can be used as evidence of our past. For them to be able to do this work, however, the records, whether in a physical or a virtual format, must come into their professional care. Archivists are educated to manage records, arrange and describe them, and facilitate their communication, all the while respecting legitimate restrictions on their consultation. The AAQ and the ACA assert that documentary evidence from the past, when managed appropriately and professionally throughout its life-cycle, can have a major impact on the present. The work of the Truth and Reconciliation Commission, which gave rise to an important reflection on, and a massive intervention in the matter of accessibility of government archives, demonstrates the validity of this position.

The perception that « secret archives » exist derives from a greater threat to the documentary heritage of this country, the generally poor quality of the support given to the records management function in many government organizations, including those of the federal government. The challenging conditions under which government archivists are working may be, at least in part, why the 'mountains of records' mentioned in the CBC article might easily be construed as 'secret archives.'

Many of the ACA and AAQ members work in government organizations at the national, provincial, and local levels; some of them are involved in the creation and management of current records, while others preserve the historical records that have accumulated through the years. Many are working in circumstances where the lack of resources, the low profile of the records management and archives functions, and the absence of senior level attention and support are challenging their ability to manage the records required to document government decision-making, enable government organizations to hold themselves to account for their decisions and actions, and allow an archives to acquire, preserve and make available records of long term historical value. The dire state of records management has been highlighted in a number of studies and evaluations, several of which are referenced at the end of this letter.

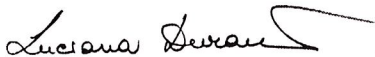
In light of these circumstances, we suggest that, in parallel with your continued investigation into the issue of 'secret archives,' you consider undertaking an in-depth and transparent investigation into the ability of government organizations to manage the records they need to meet their business and accountability requirements and to ensure

the acquisition, preservation and continued accessibility of the historical record by the designated archival institution. For instance, while we share the concerns of historians about the accessibility of largely paper-based historical records, we have an even greater concern about the profession's collective ability to deal with the largely digital records being created today that may never become historical records tomorrow if they are not properly created and managed for purposes of preservation over the long term from the moment of the design of the digital system in which they are generated, received and kept. The impact of technological change and poor resources on the continued accessibility of records in digital form presents a substantial challenge to the ability of current and future Canadians to have access, as your article puts it, to the 'raw materials' that 'bring our history alive'.

The archival profession and the ACA and AAQ, which represent it, support the complete life cycle management of records from their creation to their transfer to the control of the archives. As highlighted in this letter, the profession provides the tools and services required to help organizations manage and preserve the records that document their decisions and actions, ensure organizational continuity, and protect the rights of the organization's stakeholders and clients. It is vital though that the government provide the needed resources and legislative support required to support this role.

Should you wish to discuss our suggestion and the points raised in this letter we would be pleased to do so at your convenience.

Sincerely,



Luciana Duranti, President

Association of Canadian Archivists



Carole Saulnier

Président, Association des archivistes du Québec

Examples of Records Management Assessment Reports

Examples at the federal level include reports produced by the Internal Audit and Evaluation Bureau of the federal government's Treasury Board Secretariat:

- "Horizontal Internal Audit of Electronic Recordkeeping in Large Departments and Agencies", December, 2011 (<https://www.tbs-sct.gc.ca/report/orp/2011/itl-itg01-eng.asp>);
- "Horizontal Internal Audit of Electronic Recordkeeping in Small Departments and Agencies", December, 2011 (<https://www.tbs-sct.gc.ca/report/orp/2011/iad-vidtb-eng.asp>);
- "Horizontal Internal Audit of Information Management in Large and Small Departments and Agencies", October, 2016 (<https://www.canada.ca/en/treasury-board-secretariat/services/audit-evaluation/horizontal-internal-audits/horizontal-internal-auditinformation-management-large-small-departments.html>).

An example at the provincial level is the publication, "Special Report: A Failure to Archive - Recommendations to Modernize Government Records Management", published by the Office of the Information and Privacy Commissioner for British Columbia (2014) (<https://www.oipc.bc.ca/special-reports/1664>).

An example at the local level that addresses the recordkeeping situation in a municipality supporting a significant Canadian event is the report, "Investigation into Records Management Practices at TO2015", published by the Information and Privacy Commissioner of Ontario (September, 2016) (<https://www.ipc.on.ca/wp-content/uploads/2016/09/to2015.pdf>).