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## DEVELOPMENT OF FINNISH ARCHIVAL APPRAISAL

### Abstract

*Finnish appraisal has been characterized as proactive, democratic, and "semi-jenkinsonian". The idea of proactive appraisal was adopted from Sweden in the 1930's. The goal is to make decisions about retention at an early phase in records' life span. Appraisal is "democratic" in the sense that it has strived to leave a complete picture of the Finnish society in the archives. This has been reflected in sampling methods that have lost their popularity with the advance of digitalization. Appraisal is semi-jenkinsonian in the sense that decisions about permanent retention are made in co-operation with the agencies in the national and municipal administration. Since the 1980's, records management plans have been a vital part of the appraisal processes. Current challenges of appraisal include the need to appraise ambient functions (like healthcare, or social welfare) instead of records of individual agencies, among others.*

**Keywords:** appraisal, sampling, disposal, archival history, Finland

## SVILUPPO DELLA VALUTAZIONE D'ARCHIVIO FINLANDESE

### Sintesi

*La valutazione finlandese è stata caratterizzata come proattiva, democratica e "semi-jenkinsoniana". L'idea di una valutazione proattiva è stata adottata dalla Svezia negli anni '30. L'obiettivo è prendere decisioni sulla conservazione in una fase iniziale della vita dei record. La valutazione è "democratica", nel senso che ha cercato di lasciare negli archivi un quadro completo della società finlandese. Ciò si è riflesso nei metodi di campionamento che hanno perso popolarità con l'avanzare della digitalizzazione. La valutazione è semi-jenkinsoniana, nel senso che le decisioni sulla conservazione permanente vengono prese in collaborazione con le agenzie dell'amministrazione statale e municipale. Dagli anni '80 i piani di gestione delle registrazioni sono stati una parte vitale dei processi di valutazione. Le attuali sfide della valutazione includono, tra le altre cose, la necessità di valutare le funzioni ambientali (come l'assistenza sanitaria o il benessere sociale) anziché i registri delle singole agenzie.*

**Parole chiave:** valutazione, campionamento, smaltimento, storia d'archivio, Finlandia

## RAZVOJ FINSKEGA ARHIVSKEGA VREDNOTENJA

### **Povzetek**

*Finsko vrednotenje je bilo označeno kot proaktivno, demokratično in »pol-jenkinsonsko«. Ideja o proaktivnem vrednotenju je bila prevzeta po švedskem modelu v tridesetih letih prejšnjega stoletja. Cilj je sprejeti odločitve o hrambi v zgodnji fazi življenjske dobe zapisov. Vrednotenje je »demokratično« v smislu, da si je prizadevalo pustiti popolno sliko finske družbe v arhivih. To se je odrazilo v metodah vzorčenja, ki so z napredovanjem digitalizacije izgubile svojo priljubljenost. Vrednotenje je označeno kot napol-jenkinsonsko v smislu, da se odločitve o trajni hrambi sprejemajo v sodelovanju z organi v državni in občinski upravi. Od osemdesetih let prejšnjega stoletja so bili načrti za upravljanje dokumentov bistven del procesov vrednotenja. Trenutni izzivi vrednotenja med drugim vključujejo tudi potrebo po vrednotenju funkcij okolice (kot sta zdravstvo ali socialno varstvo) namesto evidenc posameznih agencij.*

**Ključne besede:** vrednotenje, vzorčenje, odstranjevanje, arhivska zgodovina, Finska

First formal decision about archival appraisal of public records took place in year 1866 when Imperial Senate purged some of its records. First plans for appraisal were made in year 1883. The person behind this was head of the National Archives of Finland, State Archivist Reinhold Hausen (1850–1942) who was active also when some financial records were purged in year 1906. Hausen was not the first State Archivist to have interest in appraisal (Lybeck, 2014, pp. 308–309), but he was progressive in his ideas. While Hausen in many ways was a typical archivist-paleographer of his era and interested in publication of medieval documents (Litzen, 2000) he also understood need to restrict flood of records to the National Archives and did not hesitate to take an active role in appraisal. However, at Hausen's time there was no legal mandate for the National Archives to make decisions about appraisal. The decisions were made formally by the Senate or one of its ministries and only prepared by the National Archives. Some records were destroyed also without any authorization. (Lybeck, 2016b, pp. 159–175; Mäenpää, 1994.)

First Archives Act was enacted in year 1939. The purpose of the act was more to protect records than to limit their number. Therefore, it stated that records of government and municipal agencies could be destroyed only with permission of the National Archives. This gave the National Archives a decisive, but passive role in appraisal: it could not act on its own initiative and give orders about disposition of records. (Lybeck, 2016a, pp. 179.)

Even before this in year 1936 a committee – with State Archivist K. V. Blomstedt as its sole member – had been given the task to consider issues of archival appraisal. Blomstedt visited Denmark and Sweden and brought to Finland idea of proactive appraisal. This has had lasting influence on Finnish appraisal practices. In Sweden proactive appraisal had been defended by arguments from archival theory. It was argued that destroying records in a fonds violated principle of provenance. Therefore, it was better to destroy records before they were annexed to the fonds – naturally, this was to happen without endangering the fonds as evidence of activities behind its creation. In Finland, Blomstedt did not resort to theoretical arguments. His grounds for proactive appraisal were purely practical: retrospective appraisal was time-consuming and labor-intensive, unless there was a large number of similar records that could be purged at once. (Mäenpää, 1994.)

Blomstedt noted that making decisions about appraisal would be an overwhelming task for one person. Therefore, and again following Swedish example, Committee for Reduction of Archival Documents (*Arkistoaineisten supistamiskomitea*) was founded in year 1947. The committee was in existence until the year 1970. It was chaired by State Archivist. Other members included representatives from provincial administration, Evangelic-Lutheran Church, Postal and Telegraph Service, and Ministry of Justice. The committee consulted historians and other specialists in its work. In practice, it drafted proposals for appraisal which were then approved by the National Archives. Inclusion of researchers was successful, and the work of the committee was generally productive. (Mäenpää, 1994; Nuorteva & Happonen, 2016, pp. 237–241.)

Thus, agencies were involved in the appraisal process. Besides proactive approach, this has been a characteristic of Finnish appraisal since. Therefore, Finnish appraisal has been described as “semi-jenkinsonian” (Voutilainen et al., 2020). In the beginning involving agencies was not easy. Agencies were unfamiliar with the concept of appraisal and with needs of researchers. Therefore, when the committee asked agencies to suggest records that might be destroyed, the agencies were often unable to identify any or they found only few records belonging to this group. Sometimes they suggested purging such records that are generally considered to have permanent value. (Mäenpää, 1994.)

Proactive appraisal was formulated for the first time in instructions for municipal agencies in year 1941. The instructions stated that records with limited retention time should be put in series of their own and the retention time should be noted in the archival inventory so that these records could be later easily separated from others. (Lybeck, 2016a, pp. 202.) It was customary to take disposal actions on series level. It was also suggested that registry office might mark retention times on files when they are created (Blomstedt, 1947, pp. 7–8). This practice was never recommended by the National Archives, but nevertheless, it was the practice that was followed occasionally, at least in the archives of one of provincial governments (T. Voutilainen, personal communication, 29 November 2021).

The National Archives of Finland had adopted early in the 20<sup>th</sup> century a records' classification scheme from Sweden. The scheme was very simple. The records were divided in main series according to their form regardless of subject matter; "Registry books", "Lists and Inventories", "Minutes", "Incoming letters", "Outgoing letters", "Financial Records", etc. Every main series was identified by a capital letter and subseries by one or more minuscules. Thus, for instance, the series for registry books – this was main series (*A*) in scheme's Finnish version which differed from the Swedish in some details – was usually divided into two sub-series: registry books in matters that were initiated by government agencies (*Aa*) and registry books for other matters (*Ab*). This "ABC-scheme" was created by Swedish State Archivist Emil Hildebrand in year 1903. Internally it was applied in the National Archives of Finland to a fonds in year 1911 (Lybeck, 2016b), but the National Archives began to promulgate its wider use in state and municipal agencies only in the 1940's. (Orrman, 2019a.)

ABC-scheme was in effect a simple indexing language. Its disadvantage was that it did not reveal anything about the functions of an agency or subject matters that the agency dealt with. On the positive side, this made the scheme generally applicable: regardless of their functions all government and municipal organizations had registries, they sent and received letters, kept track of financial transactions, etc. The scheme brought across fonds welcome uniformity, and therefore, it was favored in the National Archives in comparison to functional classifications. (About discussion, see e.g. Haila, 2018; Jääskeläinen, 2000.) The ABC-scheme dominated knowledge organization in Finnish archives and records management until functional classifications gradually replaced it in last decades of the 20<sup>th</sup> century. ABC-scheme was still the model to be followed when the National Archives gave instructions to municipal archives in year 1979 (Orrman, 2019a).

Instructions for municipal authorities (1941) stated that records whose "permanent retention appears to be clearly unnecessary" should be put in a series of their own, if possible (Valtionarkisto, 1941, pp. 9). Government agencies were instructed to take care that it is possible to purge larger sets of records "according to a pre-existing plan" instead of individual documents one by one (Virastotyö tehokkaaksi III, 1948, pp. 50). It was said that registry classification scheme should be such that one class in a registry should contain only records with identical retention time (Arkistolaitos, 1995, pp. 12; Asiakirjojen käsittely ja säilytys, 1984, pp. 27). At least one agency, Provincial government in Mikkeli, purged records by their registry class, but it is not known how widespread this practice was (T. Voutilainen, personal communication, 29 November 2021).

ABC Scheme was applied mainly to records of permanent value, but sometimes ephemeral series were included in it. An example of inclusion of ephemeral series can be found in instructions for the Finnish Defence Forces (1974). The instructions stated that main series *J* was to be divided into three sub-series according to retention time of records; *Ja* was for records to be purged after one year, *Jb* after three years, and *Jc* after ten years.

These sub-series had further subdivisions. For instance, "General orders for the garrison" was one of the series to be purged after three years, sub-sub-series *Jbd*. (Puolustusvoimain arkistokaava ja kirjelmäryhmitys, 1974).

In short, although the idea of proactive appraisal was adopted in the 1930's full realization of the idea took decades. For a long time, there was often need for retrospective disposal actions. Despite guidance and archival education, agencies did not have interest in making proposals about records' disposal to the National Archives. Only when there was no storage space left they simply suggested most space consuming records to be purged without consideration for needs of record keeping. (Haila, 2018, pp. 33) From the 1950's the Committee for Reduction of Archival Documents prepared disposition plans whose purpose was to reduce number of records to be preserved. (Lybeck, 2016a, pp. 181). First decision about retention times for ephemeral records is from year 1951 (Haila, 2018, pp. 9).

### Experiments in sampling

One has tried in Finland to get in archives a representative picture of the society instead of documenting only exceptional events and elites (Lybeck, 2000). To attain representativeness records sampling has been a popular in Finnish appraisal. Many of the sampling methods are adaptations of common statistical methods. For instance, both random sampling and systematic sampling method have been used in Finland (Leppänen, 1995; for sampling methods, see Coessens & Heirman, 2020). Only a sample of records has been preserved in cases in which the records are voluminous, or mostly identical, and their information content is limited or rarely unique (Leppänen, 1999).

Sampling or – to be more exact, how a sampling method is applied – is not without weaknesses. For instance, in year 1990 the National Archives decided that records from debt recovery proceedings would be preserved permanently only if they were dated in a year ending with zero. When economic crisis hit Finland hard in the beginning of the 1990's, this decision meant that information from this catastrophic period would be incomplete. The appraisal decision was quickly modified, but some of the records had already been destroyed (M. Leppänen, personal communication, 27 May 2006).

Sometimes decisions about permanent preservation have been unclear and open for multiple interpretations. The National Archives has in some cases stated that records from every fifth year are to be preserved permanently but left undefined what "every fifth year" means. Administrative processes often span multiple years. Some agencies took the year when an administrative process began as the starting point, others the ending year. Thus, the result was inconsistent, and the files preserved disparate. Naturally, this is an outcome from inadequate instructions and insufficient guidance, not a fault of the sampling method (T. Voutilainen, personal communication, 29 November 2021).

Most interesting sampling methods are those that have been devised particularly for records sampling. Birthday sampling is perhaps typical for Nordic countries. It has been applied to voluminous medical records, among others (Vallenius, 2021). In birthday sampling records of persons born on specific days of month are preserved; in Finland, these days are 8th, 18th, and 28th. In other Nordic countries the days are different, but the principle is same. The idea is that preserving information about same persons in different fonds gives researchers most versatile view on the life of individuals and allows usage of this information in various combinations. (Leppänen, 1995; Orrman, 2019b; Orrman, 2019c). It also enables following some persons' life span from cradle to grave (Vallenius, 2021).

Other sampling experiments have included type fonds and Mini-Finland. A "type fonds" is preserved more completely than other similar fonds, that is, fonds from agencies having the same function. Thus, it is a type fonds is an example of a fonds that has not gone through the appraisal process. Often type fonds belong to agencies in "mini-Finland." Mini-Finland was a set of areas that the National Archives compiled in the 1950's together with the Central Office for Statistics. The idea was that one would preserve more records from these areas, and thus, have a representative sample of the whole country (Leppänen, 1995; Orrman, 2019b, 2019c).

Today sampling is largely forgotten as a method for appraisal. Yearly accrual became too large which forced to abandon the concept of type fonds in the 1980's. Mini-Finland was challenged by changing administrative structures and borders. Birthday sampling was also a disappointment. Birthday sampling did not serve medical research like it was hoped. For instance, it is not useful in tracking hereditary diseases (Vallenius, 2021). However, the most important reason for the disfavor of sampling methods is that in digital environment they do not bring significant savings in storage space. On the other hand, it must be noted that the need to minimize preservation of personal data has again revitalized interest in archival sampling (T. Voutilainen, personal communication, 29 November 2021).

## EMERGENCE OF RECORDS MANAGEMENT PLANS

Next significant step in Finnish appraisal was paradigm change in the 1970's. At that time attention shifted from archives as historical accumulations of records to information management in government and municipal agencies. Interest in information management had risen already in the 1940's and 1950's, but now creation of a fonds became the focus of archival thinking and practices. In modern terms this might be seen as development of records management, but at what point Finnish records management is born is debatable and depends on what is understood by the concept. Practice of keeping registries had always kept archives in close contact with daily work in organizations. In addition, proactive appraisal may be seen as "records management" of a kind. (Lybeck, 2016a, pp. 176, pp. 217–218.) On the other hand, if records management means looking records solely from organizational perspective by a profession that it is distinct from the archivists, Finnish public sector organizations may still lack records management.

Already in the 1960's it had become increasingly clear that expanding administration required more flexible approaches. Quantity, quality, and content of records was simply too diversified to be managed by the now old-fashioned ABC-schema. Although the National Archives was still satisfied with it, the schema did not serve agencies in their work. Thus, a gap was forming between archives and work practices in the agencies. At the same time, appraisal had to be intensified. In the 1970's about one third of records was preserved permanently. This was too much. The new goal was now to preserve 15–20 % of records. This required more stringent disposal measures (Haila, 2018, pp. 39).

It seems evident that one of the problems was that the National Archives operated blind-folded. The 1941 instructions for municipal agencies stated that

"...all records belonging to the municipal archives are to be preserved if the legislation does not state otherwise. Records that are unnecessary may be nevertheless purged with the permission, or following the instructions... of the National Archives" (Valtionarkisto, 1941).

From this one may conclude that the National Archives could not have the big picture of records in municipal agencies. It was notified of the existence of records only when one wanted to purge them. Secondly, the National Archives could not act without initiative of an agency. In this situation setting national goals for appraisal must have been challenging. There were different ideas about what should be done. The situation was problematic for many reasons. A breakthrough was idea that archivist should be able to proactively and systematically steer how a fonds is formed in the work of an agency (Lampela, 2016, pp. 21). The older Archives Act of 1939 had excluded registration and filing from the domain of archives management, but as a sign of the new approach they became under its control in year 1981 in the new Archives Act (Orrman, 2015).

A new tool for planning records' life span had appeared in the middle of the 1970's in the courses of the National Archives (Haila, 2018, pp. 45). The new Archives Act (1981) made this new tool mandatory for every government and municipal agency. The act stipulated that every government and municipal agency must have a Records Management Plan (arkistonmuodostussuunnitelma, literally "Archives Creation Plan"). Similar plans (in Swedish arkivbildningsplan) had existed in Sweden since the 1960's, but unlike in Sweden, in Finland agencies were now obliged by law to maintain such a plan (Lybeck, 2006, pp. 79).

In a Records Management Plan all the records created by the agency are grouped by function in which they are created or received. The plan indicates the retention times, whether the records are registered, and lists places where they are stored first short time and then for longer periods. The plan also shows the arrangement of records and their series in the physical fonds if the retention time warrants such a location; most records do not need it. Thus, from the plan one gets comprehensively information about records' context, management, and archival organization (Lampela, 2016, pp. 32).

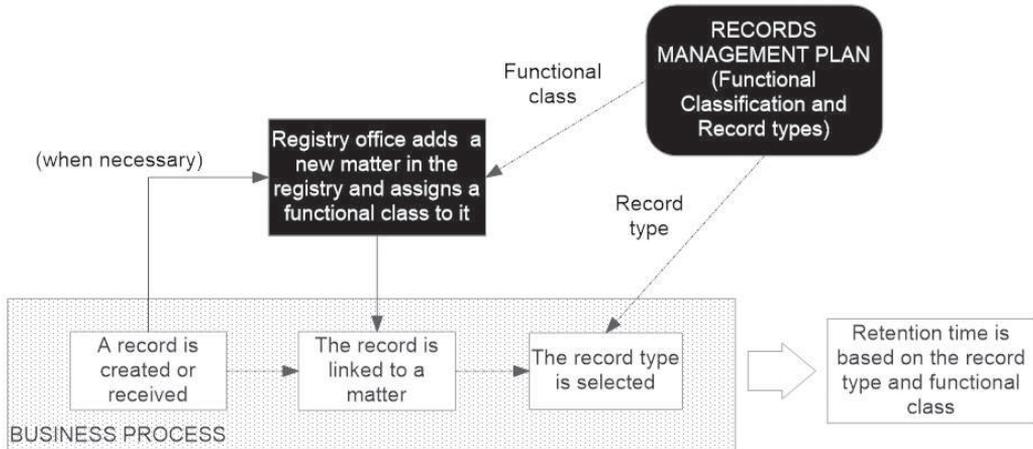
Records Management Plans are still a requirement stipulated in the Archives Act. They are significant for number of reasons. Firstly, although it is possible to apply the plans retrospectively, they are about records that are to be created or received in the administration. Thus, they made proactive appraisal the norm to be followed.

Secondly, Records Management Plans integrate records continuum (Valtonen, 2005, pp. 49). The plans ideally serve different stakeholders, although in practice keeping them up to date has been difficult and they have been underutilized in agencies (Lampela, 2016, pp. 32–33; Lybeck, 2000):

1. For administration, the plans are a guidebook to be followed in its daily work.
2. The plans serve content-based information retrieval because in them records with similar content and function are grouped together.
3. For records management, the plans enable efficient planning and steering of records processes and record life span.
4. For the National Archives the plans are disposition proposals. The National Archives accepts the plans and uses them to select part of the records that is to be later preserved in its custody permanently.
5. The plans also collect from the agencies information that can be used in archival descriptions.

In the core of the plans is a functional classification in which all record types were listed. Retention time is defined by combination of functional classification and record type: for instance, an incoming letter in function A may have a different retention time from other records created in the same function and from incoming letters in function B. This allows making finely tuned decisions about what information is to be preserved.

## APPRAISAL IN ELECTRONIC RECORDS MANAGEMENT SYSTEMS



**Figure 1: Managing records' life span in SÄHKE1**

Thus, Finnish archival thinking was geared towards proactive and function-based records management already in the 1980's before digitalization. By the turn of this century Finnish government was taking further actions to develop public sector information management. The National Archives was given the task to develop long term preservation of electronic records. This eventually led to development of functional requirements for Finnish electronic records management systems. Evaluation of electronic records management systems in year 2002 had revealed that systems in use were not adequate for management of electronic records. They were built on software from foreign vendors, and consequently, often lacked or did not fully support special characteristics of Finnish recordkeeping; proactive appraisal, Records Management Plans, and keeping registries. Therefore, in 2005 the National Archives published its own specification for functional requirements (SÄHKE1) in which these national features were considered (Pohjola & Happonen, 2014).

In SÄHKE1 compatible systems a record stored in the system gets its retention time and other critical metadata values from the system's Records Management Plan (see Fig. 1). The values determining retention time are based on the record's functional class and type.

In the second version of SÄHKE (2008) Records Management Plan was separated to a system of its own. The idea was that this new information system (called "Information Control System") would take care of management processes and interact with other information systems via application programming interfaces (APIs). The Information Control System would automate records management processes across the organization and be a general source of metadata. Unfortunately, this vision has had only limited success outside electronic records management systems.

### FINNISH THEORY OF APPRAISAL – OR LACK OF IT

Public theoretical discussion has been practically non-existent. Finnish approach to archival appraisal has been described as pragmatic. There has not been a "grand theory" that would guide decisions about appraisal. It has been argued that this is actually a strength, because it safeguards appraisal from bias: a flaw in the grand theory would be reflected in all decisions that are based on it, but decisions made from purely pragmatic point of view are sometimes good and sometimes bad (Lybeck, 2000).

In "Appraisal 2000" -project the National Archives examined its tradition critically, codified, and refined principles of appraisal for the first time while it also tried to enhance quality

of appraisal by applying new principles. Instead of creating a "grand theory" the goal was to create "a balanced view that takes different perspectives and approaches into account." (Lybeck, 2000). Appraisal of the National Archives was described as "practical, down to earth approach that is proactive and founded upon co-operation with the agencies" (Repo-Lehikoinen, 2001). The result was for the first time (2008) a document describing appraisal policy and a manual for those who drafted appraisal decisions in the National Archives.

Finnish appraisal tradition is clearly a compilation of influences from many sources. Schellenberg's value theory has been very influential in Finland (Lybeck, 2000). Sweden and Germany were important models for appraisal in the 1920's and in the 1930's, although it is difficult to point out ideas and practices that came from a particular country. Term *seulonta* (separating important from non-important) is probably of German origin (*Sichtung*). Idea of importance of administrative hierarchy was probably adopted from Germany. Furthermore, principle of preserving a copy of sent letters in archives follows a German model. On the other hand, interest in sampling methods has Swedish origin and Sweden has altogether had bigger influence in Finnish appraisal than Germany (Lybeck, 1998).

The appraisal policy documents have been revised twice since, in years 2012 and 2020. Macro-appraisal is perhaps now more clearly than ever starting point for appraisal process, although macro-appraisal was included already in the 2008 versions of policy documents (Arkistolaitos, 2008a; Arkistolaitos, 2008b). After macro-appraisal – evaluation of functions and actors – focus is shifts to content of the records, to form in which the information is to be preserved (born digital information is now preserved digitally as a rule) and costs of preservation (Kansallisarkisto, 2020).

## CURRENT CHALLENGES OF APPRAISAL

Finnish appraisal is currently challenged in three ways, at least. The first challenge comes from legislation. The current Archives Act (1994) is outdated and conflicts with more recent legislation and with the General Data Protection Regulation of the European Union. Therefore, the Archives Act will be renewed in years to come. At this point also appraisal process in public administration and the role of the National Archives may be re-examined. A new requirement is that long-term preservation must have legal basis and, hence, the new law must be written to support decisions about appraisal. Until now grounds for long term preservation have been in the discretion of the National Archives (Tiedonhallinnan lainsäädännön kehittämislinjaukset, 2017, pp. 141).

Second change is a consequence of the digitalization. Before digitalization appraisal and accessioning of records were more in the domain of recordkeeping professionals. In past when representatives of the National Archives discussed disposal with an agency, they were usually confronted with its records manager or archivist. In digital environment appraisal process has become more complex. Privacy issues must be considered in a new way. Because of technological questions disposal may be complicated and expensive. Data may have value as "new oil." In short, there are more stakeholders to appraisal. Therefore, when an archivist from the National Archives today meets people from an agency there is often a spectrum of professionals to negotiate with; besides recordkeeping professionals, there are other information professionals, managers, ICT-professionals, and lawyers.

Thirdly, digitalization challenges traditional agency-based paradigm of Finnish archival appraisal. From the point of view regulations, appraisal still takes place either organisation by organisation (e.g., police department by police department), or at its best, by appraising similar organisations at one stroke (making decisions that apply to all the police departments).

However, one should be able to appraise ambient functions. In any field of the modern networked society there are today multiple actors in interaction. Therefore, ideally one could appraise fields like "social welfare" or "health care" as a whole: to have first the big picture of actors, interrelated functions, information flows, and systems, and only then make decisions about what is important enough to be preserved. Generally, this is not possible. Agencies make and renew their Records Management Plans independently and sometimes in separation from others working in the same field. The plans come to the National Archives for approval at different times one by one. Thus, appraisal decisions are piecemeal. The National Archives combats this fragmentation by encouraging co-operation and branches of administration to making joint disposal proposals for their sector (for instance, National Courts Administration on behalf of all the courts) but currently this is not required in the legislation.

Fourthly, shared information systems are problematic. Agencies may have a legal obligation to deliver their data to a shared information system, but in legislation no-one has been given responsibility to preserve this information. Data in a shared system may also duplicate data in the agency (T. Voutilainen, personal communication, 29 November 2021). Finally, the National Archives still needs the initiative of an agency: appraisal process starts when an agency sends its Records Management Plan to the National Archives for approval. The National Archives would like to have a more active role, but also this requires changes in the legislation.

In summary, current situation requires corrective legislative actions, and, in addition, new methods that allow appraisal transcending organisational borders. The current Archives Act (1994) will be renewed in years to come. Hopefully, it will be a step forward.

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