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   Department of Internal Affairs
   New Zealand Government
   National Archival and Library Institutions Ministerial Group
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   For more information please visit www.dia.govt.nz/National-Archival-and-Library-Institutions-Ministerial-Group
   Submitting feedback
   (All first and middle names) Eve Young
   (Organisation, if relevant)
   (Email address) s9(2)(a)
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Last updated 16 July 2018
Questions

(1. What are the two or three key challenges for the national archival and library institutions (Archives New Zealand, the National Library of New Zealand and Nga Taonga Sound and Vision)? What is the most urgent challenge?)

Challenges

* lack of specific and significant regulatory powers
* Low public profiles - outside of the profession, most people don't seem to be clear about the roles and function of these institutions
* Shortage of skilled staff in specialist roles
* they are smallish government entities doing similar things in isolation of each other, not maximizing skill sets/knowledge across sectors/not working cooperatively to maximize funding/resources

(2. Does the position of Chief Archivist have the independence and authority necessary to be an effective regulator of records and information management within its broad regulatory mandate? Does the position of National Librarian have the independence and authority necessary to carry out the responsibilities of that position? Why/why not?) I think the available legislation clearly but broadly outlines the roles of the Chief Archivist/National Librarian as well as specific fines for failing to comply. (Public Records Act s61 and s62 and s40 of the National Library of New Zealand (Te Puna Matauranga o Aotearoa) Act 2003).

However, I am unsure if these consequences are well known to citizens not working in a library or records management specific role. I also wonder about the low penalty rate not having a significant impact on a government agency or if there have been cases where government agencies/individuals have been prosecuted by Archives New Zealand or the National Library.

Would more regulations outlining specific regulatory powers of the Chief Archivist and National Librarian be more effective?
3. What changes, if any, would you suggest to the role or structure of Archives New Zealand or the National Library? Stay as they are but create regulations to give more power to the CEO's of each organisation, perhaps around investigations and audits.

4. What opportunities exist for the national archival and library institutions to work more effectively together in collecting, preserving and providing access to New Zealand's documentary heritage? In particular, what opportunities exist in relation to digital preservation and access? * physical space

* shared technologies or systems across agencies that public can access specific parts of

Page 3 of 4
(5. What does the public need in the next 30 years from the national archival and library institutions?) Immediate future - public understand their roles and functions and how these services/products would be meaningful in both a personal/national context

Next 30 years - easily accessible digital products/services that public can upload, share as appropriate for their own work/personal projects

(6. Any other comments?)

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The most urgent challenge is the rapid pace of change in the digital arena, especially around Information Management practices - ensuring institutions understand what needs doing and have the capacity to comply. Another, related, challenge is the need to preserve 'born digital' information in ways that mean future generations won't experience serious issues with legacy formats and systems. Again, the role of Archives New Zealand in informing, advising and monitoring is critical. In the three strategic focus areas it refers to "taking archives to the people" so users can "discover, use, celebrate and connect". A critical challenge in this area is that many New Zealanders still have limited or inequitable access to technology. Until the digital divide is adequately addressed the drive to "push information out" cannot fully succeed. A challenge for The National Library relates to the expectation they "collect, preserve and protect documents". In conversation with public librarians in the last 3 years the National Library has signaled that National Library "should not be seen as the keeper of the last of the last" which seems at odds with their mandate. This has meant some public libraries are unsure if National Library are "collecting and preserving" all of New Zealand's documentary heritage. 

I believe the role of National Librarian has the independence and authority necessary to carry out the responsibilities, given that this role does not have a regulatory role in terms of holding government accountable. The same is not the case for the Chief Archivist however. Given Archives New Zealand has a regulatory role under the Public Records Act 2005 to promote "transparent and accountable government" it would be sensible for the role of Chief Archivist to be more independent than current reporting lines appear to allow. I don't believe making the role an Officer of Parliament is necessarily the right move, but would prefer the review considers how other statutory officers maintain their independence.

I have no comment on the structure of either organisation. However, it would appear for the last 2 or 3 years there has been almost constant restructuring at National Library. This has had a negative impact on workloads, and confidence levels, and has meant a lack of continuity for staff outside the organisation who deal with NL on a regular basis. The loss of institutional knowledge is of concern to staff in public libraries who look to National Library for guidance and support. It would be good to see the structure confirmed so people can settle into their roles and develop their areas of expertise.

I believe there is scope for public libraries to work alongside National Library in the area of digital preservation and access. If NL can provide guidance and support, many public libraries would be keen to digitise locally held materials and make them accessible to the public on a national scale, and have the staffing capacity to do so provided time frames were sufficiently flexible. As mentioned, I have concerns about whether NL is keeping all of our documentary heritage. I know some libraries, despite space constraints, are keeping the last copy of some publications for fear NL may not be doing so. This is unfortunate, costly for the ratepayers, and is an area that needs addressing. If, in fact, NL cannot be the "keeper of the last of the last" they need to say so, and work with libraries across to New Zealand to find a way forward that involves a more collaborative approach.
In the next 30 years the public needs: the digital divide addressed so the information gathered and preserved can be accessed by all a strong public-facing focus on transparency in government so New Zealanders can continue to trust in the democratic process and, hopefully, avoid some of the political unrest seen overseas which has at least some correlation to lack of trust in the democratic process inspirational leadership to manage the rapid pace of digital change, especially in regards to preservation of 'born digital' heritage support to learn and maintain the skills necessary to flourish in the knowledge economy through digital literacy initiatives National Library to work alongside public libraries to ensure local documentary heritage is made available National Library to provide strong inspirational leadership around the value of libraries as libraries or repositories of knowledge, not simply as community hubs
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Ministry for Culture and Heritage

Department of Internal Affairs

New Zealand Government

National Archival and Library Institutions Ministerial Group

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Submitting feedback

(All first and middle names) Cherry Lynne

(Surname) Gordon

(Organisation, if relevant)

(Email address) s9(2)(a)

(Best phone number) s9(2)(a)

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Last updated 16 July 2018

Questions

(1. What are the two or three key challenges for the national archival and library institutions (Archives New Zealand, the National Library of New Zealand and Nga Taonga Sound and Vision)? What is the most urgent challenge? ) 1) Direction and fulfilment of their legislated purposed and strategic plans to provide quality information, public service and open government.

2) The type of structure. (In the case of the National Library of New Zealand (NLNZ) and Archives New Zealand (ANZ) their down-graded positioning at a third tier level within the Department of Internal Affairs (DIA) and Nga Taonga Sound and Vision’s charitable trust status, given the long-term needs of the valuable material in their care.

3) Funding of the National Library of New Zealand (NLNZ) and Archives New Zealand (ANZ) unclear and beyond the direction and control of the National Librarian and Chief Archivist, since merger into the Department of Internal Affairs (DIA) - No clear break-down in DIA standard government reports of what was formerly available to the public to analyse (e.g. in Vote National Library ); diversion of considerable funding for He Tohu; Core Crown expenses projected to trend down in the Heritage, Culture and Recreation area of the

Functional classification of core crown expenses:


Heritage, culture and recreation 881 2017/18

Heritage, culture and recreation 880 2018/19 June

Heritage, culture and recreation 851 2019/20 June

Education 14663 2018/19 June

Education 14791 2019/20 June

Education 15109 2020/21 June
The most urgent challenge: 2: Need for more satisfactory reporting and governance structures for all.

(2. Does the position of Chief Archivist have the independence and authority necessary to be an effective regulator of records and information management within its broad regulatory mandate? Does the position of National Librarian have the independence and authority necessary to carry out the responsibilities of that position? Why/why not?) Position of Chief Archivist (CA): No.

The Chief Archivist, like the Auditor-General, should be independent of Ministerial direction and be accountable to the public as an Officer of Parliament for the quality, continuity, agreed scope and maintenance of government records.

Position of National Librarian (NL): No.

Both of the above suffer from lack of ability to provide Ministers with informed, and direct free and frank advice. This is a particularly concerning matter when the government decides to negotiate integrated economic agreements involving domestic matters where the CA and NL have unique professional insights. These risk being dismissed or distorted by their third tier positioning in the DIA, organisational hierarchy.

This treatment disrespects principles of international law to which N.Z. has acceded, as well as democracy. Official information request answers risk being massaged to suit DIA public relations.

Section 7 of the National Library of New Zealand Act has three purposes.

(a) is barely able to be fulfilled. Comprehensive capture of our analogue is not sure, and particularly of NZ digital output is unpredictable; (b) under DIA leadership, supplementing the work of other libraries has not progressed to the extent it might - school library service being less personal and limited in form and volume; (c) has also not blossomed as envisaged in the Digital content strategy put forward before the merger.

All three strategies: the National Library strategy to 2030; the Collections, and Digital strategies have stalled under DIA aegis. The questionable aims of the second are particularly concerning - appearing to be shaped by lack of funding rather than fresh thinking and parallels with more hopeful organisations in a similar position.

(3. What changes, if any, would you suggest to the role or structure of Archives New Zealand or the National Library?) 1. Removal from under the direction of the Department of Internal Affairs.

2. As noted above, the Chief Archivist, like the Auditor-General, should be independent of Ministerial direction and be accountable to the public as an Officer of Parliament for the quality, continuity, agreed scope and maintenance of government records.

The British Library also sees knowledge as including science. The nature of CRI access and reporting limit the value of NZ taxpayer contributions to their knowledge bases in a digital and commercial environment.

(4. What opportunities exist for the national archival and library institutions to work more effectively together in collecting, preserving and providing access to New Zealand’s documentary heritage? In particular, what opportunities exist in relation to digital preservation and access? ) With the limited resources at their disposal, the staff responsible for digitising National Library holdings and liaising with other NZ institutions to increase the content of DigitalNZ are doing an outstanding job.

More funding for the National Library could further this.

Many small regional public libraries really need supplementation of their stock. The National Library should have enough to be able to assist with circulation of stock from its general collection.

There is research value in draft as opposed to final local and regional government plans. There needs to be a copy available of both forms for lending from the National Library for research purposes, including mutual learning by one sub-national level organisation from another. Digital copies can disappear from sight over time.

Page 3 of 4

(5. What does the public need in the next 30 years from the national archival and library institutions?) Plans that are not upended with a change of government

Therefore policies that are set that clearly match legislative purpose and provide long-term continuity.

Legislative structures and reporting such as suggested above, could assist.

More forward, current and future need thinking than just reactive or heritage thinking.

Library content can make major differences to individual’s knowledge, thinking, careers, futures and well-being - consider Professor Sir Paul Callaghan and other leading NZ scientists who have attributed key boosts to their lives courtesy of inspiring or up-to-date library content.

There is a need to seek wider availability of business and scientific database access for the regions, to facilitate innovation and increased economic development. CRIs and universities have their own client needs and contracts for electronic databases may preclude their provision of relatively up-to-date, accurate material to other libraries for use by the public.
(6. Any other comments?) When governments change scope and reporting of government functions, (e.g. in the formation of MBIE), it is very important that born digital documents and web site content does not disappear and that all New Zealanders can know exactly how to get hold of previous entities’ content.

The National Library Digital Strategy and policy documents developed for MORST and FORST were not evidently available following such a change.

Thank you for the opportunity to make comment.

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Since Archives NZ and National Library were subsumed into DIA I have seen a steady decline in their autonomy. Once prided on their leadership within their respective sectors they seem now to be so heavily weighed down by the bureaucracy of a major government department that innovation has largely fallen to the wayside. Web and other digital resources heavily relied on by the library sector have been replaced by less than ideal substitutes - OCLC in place of the old Te Puna search is a prime example. Support for The Community Archive, hosted by Archives NZ, is practically non-existent and there has been no development of the site. To me the most urgent challenge is to get control of their own destinies back so they can once again serve the people of NZ.

I believe the Chief Archivist should not be answerable to any head of a government department. The record of government should be entirely free of political or bureaucratic influence, so "No", the Chief Archivist does not have the necessary independence and authority to carry out his/her duties to the best advantage of the citizens of NZ. The National Librarian does not require the same level of independence, in my opinion, but there are advantages to having the two institutions - and perhaps Ngā Taonga as well, although I have little personal experience or knowledge to draw on there - working together to preserve the official and social and cultural records of the country. If the institutions must come under a government department at all I would think the Ministry for Culture and Heritage a much better fit.

I think I may have already answered this. Ideally I would like to see Archives NZ and the National Library both reinstated as independent entities. A good second option would be for them to move under the umbrella of the Ministry for Culture and Heritage.

The National Digital Heritage Archive is/was a great start. I would like to see much more funding for this to keep building on the momentum already created, and allow for much more input from other cultural institutions around the country.

With the disturbing rise of extreme right-wing views in many parts of the western world it is vitally important that we reinstate and maintain an autonomous archives lest we too are affected. It is also vitally important that our national institutions show leadership in ensuring the preservation and ongoing migration of the born digital records of our government and the increasing numbers of digital only publications by New Zealand writers and for and about NZ - and providing access! It will be difficult to manage this within the constraints of a government department for whom cyber security is such a vital necessity - unless Archives NZ and National Library IT systems are kept completely separate.

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National Archival and Library Institutions
Ministerial Group

I have provided a response only to the questions in which I have some experience and expertise.

Q.2. Does the position of Chief Archivist have the independence and authority necessary to be an effective regulator of records and information management within its broad regulatory mandate?

I am of the view that the position of Chief Archivist could possibly be made an Officer of Parliament comparable to that of the Ombudsmen, Controller and Auditor-General, and the Parliamentary Commissioner for the Environment.

The Chief Archivist has responsibility for setting standards for record-keeping and management of archives, but lacks the ability to enforce standards or investigate breaches of the standards or of the Public Records Act 2005 (PRA).

The Chief Archivist should have the authority in law to:

• Receive a complaint directly from members of the public, or from officials of agencies covered by the PRA, including under s.10 of the Protected Disclosures Act 2000 if it is more appropriate for the Chief Archivist to investigate;
• Receive a complaint transferred from the Ombudsmen, Privacy Commissioner, Human Rights Commissioner or the Controller and Auditor-General;
• To investigate complaints received or transferred;
• To initiate investigations of their own motion;
• To require improvements to record-keeping and management of archives where poor practice or breaches are identified;
• To lay a complaint with the Police should investigations indicate that prosecution under s61 PRA is in order;
• To report on investigations to agencies investigated and to Parliament.

There may be concerns that the position of Officer of Parliament is not appropriate for the Chief Archivist. The criteria for creating an Officer of Parliament set out in 1989 include responsibilities such as:

• To provide a check on arbitrary use of power by the executive
• To discharge functions without Parliament itself could carry out

In addition, the position should be created in separate legislation principally devoted to that position. The Public Records Act 2005 could certainly be viewed as meeting this provision, although perhaps requiring some amendment.

The check on the arbitrary use of power by the executive would be addressed through the responsibility of the Chief Archivist to ensure that government agencies create and maintain full and accurate records, thus enabling accountability and transparency. However, this accountability and transparency in the role of the Chief Archivist could be seen largely as retrospective, given that records are not required to be transferred to the custody of the National Archives until 25 years have elapsed. The Ombudsman and the Privacy Commissioner have a more immediate responsibility to ensure access to current records.

An Officer of Parliament should also not exercise executive responsibility or become involved in the development of policies and services provided by the Government. The Chief Archivist is in fact responsible for
development of policies and services directed mainly towards record-keeping staff within government and local government agencies.

An alternative approach would be to establish the position of Chief Archivist as an Independent Crown Entity comparable to the Privacy Commissioner, which position also establishes policies for government agencies as well as other bodies holding personal and private information. This would avoid some of the complexities of creating the position as an Officer of Parliament while maintaining its independence and authority.

This would entail separating the position from the Department of Internal Affairs, which could only be a positive step, and help ensure that it is not changed with the next change of government.

Responsibilities in relation to Local Authorities

In addition, there are limitations on the powers of the Chief Archivist in relation to local authorities. This needs to be addressed by including local authorities under the general provisions for direction, inspection and audit relating to public offices.

I recommend that the PRA be amended to empower the Chief Archivist to direct the administrative head of a local authority to report by adding “and local authority” to s.31, PRA, or to initiate an independent audit of local authorities by adding “and local authority” to s33(1) PRA. The reason for this change is that while local authorities are required to comply with standards issued by the Chief Archivist (ss27-28, PRA), and can be inspected by the Chief Archivist (s28, PRA) there is no provision for issuing directions for compliance to local authorities, or for reporting on investigations where poor practice or breaches are identified. Section s11(1)(d)(iv) PRA should be amended from:

To monitor, and if necessary report on, the compliance of local authorities with this Act,

To

To monitor and report on the compliance of local authorities with this Act.

This amendment brings the provisions relating to local authorities into line with those applying to public offices.

The recommendation of the power to lay complaints with the Police is to clarify the current provisions of the PRA where offences can be committed and penalties applied, but there is no indication as to who may charge a person or agency with an offence or impose penalties.

Q.3. What changes, if any, would you suggest to the role or structure of Archives New Zealand?

Records required to be kept as public archives or as local authority archives (protected records) are increasingly born digital, or have been digitised from paper exemplars. Management of these records is complex and expensive. The problem faced by many local authorities is that they cannot readily find the means to establish the IT environment required manage these records as archives and enable public access. For smaller local authorities in particular, the technical challenges and investment are beyond their reach. Even larger authorities struggle with this. Archives NZ has been working on establishing a digital archive repository for public office records. I assume that the infrastructure for such a digital archive would also be applicable for local authority archives.
Archives NZ has no authority to take deposits of local authority records in hard copy, and I am not suggesting that this should not be changed, but there is a pressing need for preparations to be made by some appropriate organisation for accepting digital archives.

It would be appropriate for Archives NZ to be empowered in law to either:

- Accept deposit of local authority records into the digital archive; or
- Work with local authorities to establish a duplicate archival system for use by local authorities using the skills and experience of Archives NZ staff acquired from managing the Archives NZ digital archive; or
- Advise local authorities as a collective on establishment and management of a digital archive.

This would avoid reinventing the wheel and also ensure consistency and compliance with relevant standards in public office and local authority systems.

Chris Gousmett

Submitted as a personal response only. It does not necessarily represent the views of my employer.
I note that I am a Trustee of the Alexander Turnbull Library Endowment Trust, and that this is a personal submission in addition to any made collectively by the Trustees.

Preface

This submission endeavours to approach the cultural institutional sector in Aotearoa New Zealand in general terms. It will take the National Library of New Zealand Te Puna Mātauranga (NLNZ) and the Alexander Turnbull Library (ATL) as exemplary cases of the consequences of the fragmentation of the cultural institutional sector within government policy and administration.

The history of the positioning of NLNZ among other government agencies is nothing better than a kind of musical chairs. At no point has it seemed possible to find a rationale (in policy, in economy, in social and cultural development) which could adequately account for the fundamental significance of national cultural institutions in the work of government and the evolution of society and in which NLNZ is an integral part.

Furthermore, it is impossible to avoid the consequences of the marginalising of cultural sector institutions in both policy and organisational standing. While on any outside measure, a close working relationship between the Ministry of Culture and Heritage (MCH), NLNZ and Archives New Zealand (ANZ) would seem to make very good sense (and previous Chief Executives have tried to recognise this fact through increasing collaboration between themselves), the low position of MCH in the hierarchy of government Ministries and Departments has discouraged attempts to formalise such a relationship. This situation pertains even when, as now and as under the previous Labour Government, the Prime Minister holds the portfolio of Arts and Culture.

Lacking institutional power has many negative consequences. One effect on NLNZ of being bound into the Department of Internal Affairs (DIA) is the requirement to conform to the high-level propositions of DIA in the formulation of strategic plans. This requirement, while understandable from the perspective of a Department of State with very diverse responsibilities, blocks recognition of the distinctive roles and national functions of our cultural institutions.
This submission will aim to address this situation by providing a rationale which can affirm the uniquely important role our national cultural institutions play as core infrastructure in a distinctive dimension of society, the cultural sector. Because this sector functions only partly within the economy (as currently measured), the role of the state in maintaining and developing it is of critical importance.

Aotearoa New Zealand, to be a fully competent 21st nation, has to become a full spectrum knowledge society at the level of policy. For this to happen, the knowledge work of our cultural institutions must be brought into the centre of knowledge policies. In other words, an integrated policy framework for our cultural institutions as knowledge institutions is needed.

With such a framework, the deficiencies in the funding and standing of the cultural sector may be remedied in an open and purposeful manner. Without it, reorganisation conceived of as restoring a previous status quo will have a very limited value either to the institutions themselves or to the publics on whose behalf they do their work.
To the National Archival and Library Institutions Ministerial Group,
seeking feedback on how to strengthen the contribution to New Zealand’s
culture and democracy made by Archives New Zealand, the National
Library of New Zealand and Ngā Taonga Sound & Vision.

1 What are the two or three key challenges for the national archival and library
institutions (Archives New Zealand, the National Library of New Zealand and Ngā
Taonga Sound and Vision)? What is the most urgent challenge?

The most urgent challenge is the lack of a policy framework which makes sense
of the role of our cultural institutions in society and government as knowledge-
creating institutions.

1.1 At present, the cultural sector in government is fragmented and inarticulate.
It is the effect of

1.1.1 a history of institutional formation responsive in an ad hoc manner to the
rapid development of new media forms and technologies from the late
nineteenth century on, and

1.1.2 the overwhelming dominance of the relationship between techno-scientific
knowledge and the economy in government policies for knowledge.

1.2 The role of our national (but also local) cultural institutions as agencies
collecting for posterity the cultural expressions of New Zealanders is critical,
because no other country or business (local or international) can be trusted to
maintain these collections in perpetuity. Our cultural institutions are uniquely
dependent on public funding for carrying out their responsibilities. But
emphasising only their collecting function obscures full recognition of their role
in generating the possibility of new cultural expressions anywhere in society and
by anyone, on which social and cultural renewal and adaptation depend.

1.3 Put another way, these institutions are critical to the possibility of research
(the formation of structured knowledge) about Aotearoa New Zealand and its
place in the world of human evolution. At present, they do not figure in research
policy, the history of which in New Zealand is entirely that of science and
technology. In particular, this is a disabling challenge for the Alexander Turnbull
Library, which is a national foundation for research into the history and future of
human occupation of the landmass of New Zealand.

2 Does the position of Chief Archivist have the independence and authority
necessary to be an effective regulator of records and information management
within its broad regulatory mandate? Does the position of National Librarian have
the independence and authority necessary to carry out the responsibilities of that
position? Why/why not?

No, for both, but for different reasons.
2.1. The Chief Archivist holds a critical position in our (unwritten) Constitution, charged with the conservation of and public access to the records of the thinking and the acts of our governments. In other words, the Chief Archivist is a guarantor of the democratic and open functioning of the state. To subordinate the Chief Archivist to any other government official is like making the Chief Justice of the Supreme Court subordinate to the Chief Executive of the Ministry of Justice.

2.2 If a new, integrated policy framework for our cultural institutions as knowledge institutions were to be formed, then the National Librarian would become the policy leader for all of our collecting institutions. This position was foreshadowed when the NLNZ developed the Digital Content Strategy. While this strategy document responded to the intervention of new digital information and communications technologies (ICTs) in our society, it also demonstrated how “content” exists in multi-media forms and the conservation of and access to it needs an integrated policy framework and infrastructure. Since it is the traditional concept and function of “the library” with its roots in manuscript and print technologies which is undergoing the fullest organisational transformation in the new ICT environment (nationally and locally), the role of the National Librarian needs to include information policy leadership for the cultural institutional sector. This clearly does not mean the collapse of all cultural institutions into one; it does mean finding a policy framework which makes policy sense of the information environment in which we now live.

3 What changes, if any, would you suggest to the role or structure of Archives New Zealand or the National Library?

My responses above will have already sketched an answer to this question. I will try to make the rationale which I believe must inform any developments within and among our cultural institutions clear in this section.

3.1 Stating the rationale.
Aotearoa New Zealand, to be a fully competent C21st nation, has to become a full spectrum knowledge society at the level of policy. The different modes of knowledge necessary to the functioning of an advanced democratic society need to be given equal standing in government.

At present, the knowledge society in policy is a techno-scientific and economic construct which represents the interests of and claims for one dimension of knowledge, scientific and technological knowledge, and one social institution, business. The strength of this relationship in government is manifested by their coordination through the Ministry of Business, Innovation and Employment (MBIE).

MBIE coordinates one part of the knowledge-creating activities of Aotearoa New Zealand. An equivalent focus for the coordination of knowledge work of the cultural sector, and its social extensions, is needed. Just as the science-technology-economy nexus does in deep ways link the various dimensions of society involved in the creation, application and distribution of techno-scientific
knowledge and its products, so there is a strong case in policy and government organisation (yet to be accepted) for the critical importance of the state’s and the public's interest in the creation, application and distribution of cultural knowledge and its products.

3.2 A core problem
Aotearoa New Zealand lacks an official name for the kind of knowledge created from the materials held by our cultural institutions. It is remarkable, even given the downgrading of the humanities internationally in recent decades, that the term “the humanities” is invisible in official policies for knowledge. Even MCH, which has managed the principal national humanities research projects (the Dictionary of New Zealand Biography, the Historical Atlas of New Zealand, Te Ara and Historical Publications) does not think of itself as “in the humanities.

What is distinctive about the kinds of knowledge which can be gathered together under the term “cultural knowledge” or “humanistic knowledge” (with “the humanities” as their expert form)? To answer this question is to recognise what is missing from official knowledge policies in New Zealand. Put in the most summary form, it is all the difference between knowledge about nature derived from our analysis of nature, and knowledge about ourselves derived from our analysis of what we have created. Summarily once again, what we have created is culture, meaning the ways in which a collectivity of people give meaning to their lives by sharing values, beliefs, language, knowledge, technologies, a land, a history.

Seen in this way, the issue is not one of the relative value of the different kinds, but of the importance of giving equal value to the forms of knowledge created by both orientations. It is impossible to underestimate the power and importance of techno-scientific knowledge; but it does currently seem quite possible to discount almost entirely in official policy the value of knowledge derived from everything humans have created over time.

It is conventional to emphasise the importance of democracy and the exercise of citizenship when referring to cultural institutions, but the implications of this value for policy must be made more explicit. The on-going formulation and dissemination of knowledge needed to ensure that our democratic institutions continue to develop on the basis of values defining what it means to be a citizen in this nation state is of an importance at least equal to economic development. The Ministry of Education is witness, in the contest between education for (global) citizenship and education for work, to the lack of fit between these different ways of valuing knowledge.

3.3 The company we keep
Powerful arguments have been made for decades in democratic societies like ours, aiming to address the now extreme imbalance in policies towards knowledge and to set out their consequences. Our situation in Aotearoa New Zealand is not, therefore, unique. But the imbalance is much more extreme, and our national cultural institutions seem much more marginal in government policy and funding than their peers are elsewhere.
To cite just one example. Throughout the whole period during which neoliberalism became the underpinning theory guiding official policies for knowledge, economy and society, the British Library has been making the case for rebalancing knowledge policy.

In 1998 the British Library and the British Council jointly organised an international colloquium, The Architecture of Knowledge. The brief for the colloquium stated that

The exponential increase in the availability of information is forcing a paradigm shift in the ways in which we work, learn and communicate. Knowledge, structured information made properly accessible, brings the most fundamental political, economic and cultural advantages.

How can we maximise these social, political, economic and cultural benefits? What new partnerships are required to build the knowledge society? How can we communicate effectively across organizations, cultures, nations and generations?

While the first paragraph now reads like a truism, its implications have been barely explored in New Zealand. Knowledge policies here have concentrated on the economic to the effective exclusion of the other three dimensions of the effects and powers of knowledge. What if becoming a fully democratic society were to be taken as a necessary condition for economic development? What if the values which have framed a dominant conception of what it means to be a New Zealander are critical to our economic success and political role in an environment of competition between nations? Why does it matter that we should think officially in time-frames of generations rather than the nano-seconds of financial transactions?

A principal sign of this deep disparity of attention is the effective command of knowledge policy and its enabling infrastructure by MBIE, and the marginal status of our cultural institutions which lack similar coherence in policy formation and enabling infrastructure. A cultural research system comes really into existence only when official data is collected in such a way that makes its value visible to government. The fragmentation of the cultural institutional sector is complemented by the fragmentation of official data representing it.

The most obvious instance of what is lacking in enabling infrastructure is research funding. The most direct means of indicating what is missing is to instance the UK’s Arts and Humanities Research Council (AHRC). To survey the knowledge work accomplished through the AHRC is to grasp immediately what could be achieved (but currently cannot) by research on the collections of our cultural institutions and in partnership with their professional staff.

The embedding of the National Library and Archives NZ in the Department of Internal Affairs is only the most striking evidence that in current policies for
knowledge our national cultural institutions are perceived to have a negligible role in new knowledge creation of value to NZ.

For all the talk about the economic value of cultural production, there has been no attempt by government to see the cultural sector as a whole and as a source of fundamental knowledge of value across the four dimensions included in the British Library statement.

An immediate measure of the gap can be found by comparing two strategic plans: the British Library's Living Knowledge. The British Library 2015 – 2023 and NLNZ’s Te Huri Mōhiotanga Hei Uara – Ngā Tohutohu Rautaki Ki 2030. Turning Knowledge into Value – Strategic Directions to 2030. The latter’s extreme limitations of scope, and notably those concerning research and the role of the Alexander Turnbull Library as a national research institution, are a direct product of the extreme limitation of view in our official policies for knowledge and the constraints placed on NLNZ by its being just a component of DIA.

New Zealand governments have so far signalily failed to attempt an answer to the questions in the second paragraph of the British Library colloquium brief. The Ministerial Review offers an unusual opportunity for that attempt to be made.

4 What opportunities exist for national archival and library institutions to work more effectively together in collecting, preserving and providing access to New Zealand’s documentary heritage? In particular, what opportunities exist in relation to digital preservation and access?

4.1 As I have written above, opportunities for making the most of our cultural institutions’ public value depend almost entirely on a new policy framework which integrates them and understands them as constituting a necessary and powerful dimension of the governance of society and the creation of new knowledge.

4.2 Over the past 30 years the absence of such a policy has deprived these institutions of their ability to fulfill their social and cultural purposes. Thinking beyond the fragmentation of the cultural sector is the first step, which these institutions cannot take without government encouragement and direction.

4.3 The term “documentary heritage” in itself can block opportunities if it is taken to mean

4.3.1 a passive role in collecting and providing access to the texts of our culture in their manifold forms; and

4.3.2 a role which limits understanding of those texts to traditional media forms, rather than to the whole panoply of ways in which New Zealanders have formulated and expressed meanings and values in material forms of all kinds, for example, buildings, landscapes, fashion, food, sport.

4.4 The signal example of these issues is the position of the Alexander Turnbull
Library, doubly subordinated in DIA and NLNZ. I have previously (1.3 above) described ATL as a foundation for knowledge creation. Together with our other collecting institutions, ATL provides the materials for the creation of new knowledge and actively participates in all aspects of research and development work based on them. The proper analogy at the level of policy is with the Crown Research Institutes. Put this way, it is astonishing that ATL has not yet been recognized as a fundamental enabler for the cultural research system in Aotearoa New Zealand and its expert and citizen researchers in the humanities, or that no conception of a national cultural research system complementary to the science system administered by MBIE has been developed. The almost invisible position of ATL in official thinking about new knowledge creation is symptomatic of the problems facing the cultural institutional sector in general.

5 What does the public need in the next 30 years from the national archival and library institutions?

The public of New Zealand (the principal investors in our cultural institutions) needs to know:

5.1 that the cultural expressions of New Zealanders are being conserved and made accessible to all New Zealanders, and that access to world knowledge is assured in the face of control over information by increasingly powerful, privately owned organisations with no responsibility to New Zealand;

5.2 that our government grasps the importance to our health as individuals and as members of a democratic society of open access to information about ourselves, and especially about the work of government on our behalf, actively publicises the importance of this work, and funds our cultural institutions to a level which enables these responsibilities to be met; and

5.3 that the professionals managing our cultural institutions are valued by our government, especially in the role of engagement with their professional colleagues in other countries like ours, so that the best possible outcome of public investment can be achieved.

6 Any other comments?

The integral role of our cultural institutions in the development of Aotearoa New Zealand as a twenty-first century knowledge society needs to be articulated clearly, coherently and comprehensively in government policy and funded commensurately.
Kia ora,

The following feedback focuses on Archives New Zealand and the position of the Chief Archivist.

1. What are the two or three key challenges for the national archival and library institutions (Archives New Zealand, the National Library of New Zealand and Ngā Taonga Sound and Vision)? What is the most urgent challenge?

The key challenge for Archives New Zealand was identified below via the submissions process in 2010 on the State Sector Management Bill.

State Sector Management Bill. Commentary section. As reported from the Education and Science Committee.


New Zealand Labour Party minority view:

“…no evidence was brought before the committee that these changes will do anything to provide the New Zealand public with better services in terms of archives or library.” P. 4

Reading through the ‘submissions & advice’ documents from 2010 that relate to Archives New Zealand and the role of the Chief Archivist it is hard to come to any other conclusion than that quoted above. No evidence was presented at the time to support bringing Archives into the Department of Internal Affairs. On the other hand, many submissions made by experts from the archives, records and information management, heritage, and other related sectors, opposed the changes to Archives New Zealand proposed in the Bill.

1. Does the position of Chief Archivist have the independence and authority necessary to be an effective regulator of records and information management within its broad regulatory mandate? Why/why not?

The appointment of the Chief Archivist as an officer of parliament may have merit, and needs some further investigation. The ability of that person to initiate and report on ‘own motion’ investigations, could be a useful way of better meeting the purposes of the Public Records Act 2005. It could also be useful to seek the advice of the Office of the Ombudsman, Privacy Commissioner and State Services Commissioner in regard...
to the costs involved of inadequate recordkeeping across government, and the extent that this problem affects their own work and investigations.

I wish to keep my email contact details confidential.

Dave Clemens

Christchurch, 8053
This is a submission to the National Archival and Library Institutions Ministerial Group on strengthening our national archives and libraries.

Submitter: Dr. Gordon W. Paynter
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Organization: None

Thank you for the opportunity to submit on this topic.

I am Dr. Gordon Paynter and I worked at the National Library of New Zealand from 2005-2012 in various technical, digitization and management roles. During that time the National Library remodeled the Molesworth Street building and introduced many innovative and world-leading changes to the way it collected digital material, digitized physical collections, and made collections available to New Zealanders.

I was a manager during the “3-2-1” program when the National Library and ArchivesNZ were merged into the Department of Internal Affairs (DIA), and various National Library systems and processes were replaced with DIA systems and processes.

After leaving the DIA in 2012 I worked as an IT Consultant in Wellington, and I currently live in the United States where I work as the Manager of a team of Data Scientists for a renewable energy company.

I remain a user of the National Library’s collections, online resources, and other services.

What are the two or three key challenges for the national archival and library institutions (Archives New Zealand, the National Library of New Zealand and Ngā Taonga Sound and Vision)? What is the most urgent challenge?

The major challenges include (1) the sheer quantity of information, including digital, paper-based, and other formats, that have to be collected and preserved; (2) satisfying the demand for digital access, and (3) the trend towards large global companies placing restrictions on library and public access to published materials (i.e. our national public record is in “walled gardens”).

These challenges have remained fairly constant over the last decade.

Does the position of Chief Archivist have the independence and authority necessary to be an effective regulator of records and information management within its broad regulatory mandate?

The Chief Archivist does not have the independence and authority to be an effective regulator.

An important part of the role of Chief Archivist is to regulate government departments and hold them to account, similar (in my opinion) to the Ombudsman.

Embedding ArchivesNZ within a government department diminishes the authority of the Chief Archivist and makes it more likely that leaders and managers in other departments will see him or her as just another manager, similar to themselves, and not properly cooperate with them.
It also creates the perception of lack of independence. The Chief Archivist could be perceived as not holding the DIA to account in the same way as other departments (for example for fear of administrative or budget consequences to ArchivesNZ), and any cancelled DIA initiative could be perceived as an application of pressure on the Chief Archivist. In a regulatory role, the perception of lack of independence is unacceptable.

**Does the position of National Librarian have the independence and authority necessary to carry out the responsibilities of that position? Why/why not?**

The National Librarian does not have the independence and authority required to meet the challenges I have outlined above. The culture, systems and practices of the DIA are not compatible with the mission of the National Library, and result in poor outcomes, but the National Librarian, as an employee of the DIA, is not empowered to make changes that would make the institution more effective.

I base the following observations on my experience in IT, digitization and management roles for the National Library during the integration with the DIA and Archives NZ.

Most of the DIA exists to regulate people, groups and information, and to enforce laws and restrictions. The Library, on the other hand, exists to be open and accessible, and to help people enjoy and access cultural artefacts. Consequently the DIA prioritizes (very real) security issues and the desire to minimize risk in its technology and systems, but these are a poor fit for a cultural institution like the Library that is dedicated to openness.

To give a few examples I remember from integration, the security measures in place to prevent harm to critical DIA systems prevented National Library staff from carrying out core services such as looking up information on certain websites or examining donated disks and electronic materials, and prevented ongoing projects from providing public WiFi access or using standard web login methods for its websites. Solutions were eventually found to these problems, but not until weeks or months had passed consulting with numerous DIA teams, and developing solutions and workarounds to comply with various DIA policies (which had replaced the equivalent National Library policies). Some National Library projects that were smaller and lower priority were put on hold for months or years, or were abandoned altogether.

While these are historic examples, I note that many of the groundbreaking programmes from the years before integration, such as the National Digital Heritage Archive, Digital New Zealand, the web harvesting programme, Papers Past, Kotui, and various digitization programmes, appear to have advanced only incrementally in the years since. The only major recent projects I can see as a user of the institution are traditional large-scale IT projects (e.g. replacing catalogue software and larger websites) and large-scale physical projects (e.g. moving the Treaty to the National Library building, and putting a passport office in the basement).

Almost all the programmes and services I have described are closely aligned to the goals and strategy of the National Library, and were slowed or halted during during and after integration the DIA. The pace of development does not appear to have recovered. I conclude that the National Librarian did not and does not have the authority and independence to make decisions that best serve the National Library.

**What changes, if any, would you suggest to the role or structure of Archives New Zealand or the National Library?**

ArchivesNZ should be an independent body, with the Chief Archivist reporting directly to a relevant minister, and with an independent budget.

The National Library should be removed from the Department of Internal Affairs and should become part of the Ministry for Culture of Heritage, similar to Te Papa. I don’t have a strong opinion as to whether this means simply changing reporting relationships, or creating a Crown Entity.

The National Library (and possibly ArchivesNZ) should then start retaining control of its systems and processes. The goals of this transformation should be (1) to avoid immediate disruption to staff and
customers, (2) to re-introduce a culture of innovation and agility, and (3) to replace costly and over-restrictive DIA systems with ones that are more appropriate to a smaller cultural institution.

This should be attempted gradually and carefully so as to avoid the expense and paralysis of the hurried 3-2-1 program. This could mean relying on the DIA’s “Shared Services” for some time, possibly indefinitely, if they are in fact the most cost-effective way for government departments to access core services.

What opportunities exist for the national archival and library institutions to work more effectively together in collecting, preserving and providing access to New Zealand’s documentary heritage? In particular, what opportunities exist in relation to digital preservation and access?

Exactly this question has been asked for the last 10 years at least. There have been numerous proposals over this time. Little has changed in the last few years.

ArchivesNZ and National Library have been sister departments within a branch of the DIA for several years, but they have not been able to effectively collaborate on these opportunities.

This suggests that either the opportunities for collaboration are limited, or that the opportunities cannot be realized while both organizations are part of the DIA and dependent on the support of DIA management.

What does the public need in the next 30 years from the national archival and library institutions?

The same thing it has had for the last 30 years, with better handling of digital material.

Any other comments?

While I believe separating the National Library and ArchivesNZ from the DIA is essential to both organizations being effective in their statutory roles in the long term, initially it will be complex and possibly expensive. This should not be glossed over and probably cannot be avoided. Continuing to use the DIA’s shared service model should ease this transition to some extent.

I have tried to limit my comments to structural problems arising from merging cultural institutions into the DIA, but these were compounded by the hurried nature of the integration process. If the institutions are separated, then experience suggests that clear goals, strong governance, and a reasonable timeframe will be essential.

A feature of the National Library prior to integration was the large number of projects that were very small (by government standards) but very impactful. The flexibility required to work in this way appears to have diminished since integration with the DIA.