



# **AUDIT OF THE DEACCESSIONING OF PRIVATE COLLECTIONS**

**October 2011**



# AUDIT OF THE DEACCESSIONING OF PRIVATE COLLECTIONS

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# AUDIT OF THE DEACCESSIONING OF PRIVATE COLLECTIONS

## EXECUTIVE SUMMARY

### Background

The Audit of the Deaccessioning of Private Collections was added to the 2011–2014 Risk-Based Audit Plan at the request of the Deputy Head and Librarian and Archivist of Canada. The field work was conducted from January to August 2011. The objective of the audit was to determine if the governance process and internal control procedures for deaccessioning private collections are adequate and effective and comply with the terms and conditions agreed upon at acquisition.

Deaccessioning is the process of disposing of a private collection or parts of it when it is decided not to acquire the collection following the appraisal process. The decision is made by the staff of the Society and Cultural Expression Branch (SCEB) and it is executed by the staff of the Analogue Preservation Branch.

Library and Archives Canada (LAC) is currently undergoing a major modernization exercise and several initiatives are under way that will have a major impact on the functions of acquisition and deaccessioning. The audit took place in this changing environment. It concludes on the measures in place during the audit testing period while ensuring that credit and consideration is given to recent and upcoming initiatives.

### Observations and recommendations

The LAC authority to acquire and dispose of archival material is clearly stated in the *Library and Archives of Canada Act*. Although the responsibilities are shared between two branches, the roles are well defined and clearly understood.

The function of deaccessioning is linked to that of acquisition and it is considered to be a by-product of that process. As a result, several elements of an effective governance structure that would normally be in place are non-existent for deaccessioning activities. However, managers indicate that deaccessioning happens as a result of the strategies and policies in place for acquisition. In addition, management considers that the risks attached to deaccessioning are very low. Therefore, there has been no risk assessment of the deaccessioning function. A major impact is that there is currently no assurance that the space and resources expended to house private collections are used in the most efficient way.

The audit recommends that the private collection appraisal and acquisition approach integrate the deaccessioning function so that strategies, work plans and risk factors are developed to ensure that collections are treated on a priority basis and the resulting deaccessioning transactions are conducted consistently and in a timely manner.

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There are clear criteria and a formal process is in place for the approval of deaccessioning actions. The deaccessioning actions tested followed the established procedure and all received formal approval.

The delegation of authority for disposition to the Director General, SCEB was not renewed on April 1, 2011. As a result, deaccessioning actions are currently limited. This should be reviewed to ensure effective deaccessioning actions.

Finally, there is a need to ensure that deaccessioning is conducted in accordance with the terms and conditions agreed to with the donor at the time of acquisition as required by the *Library and Archives of Canada Act*. There is currently no consistency in the way the terms and conditions are captured. This process to determine terms and conditions should be formalized and consistently documented.

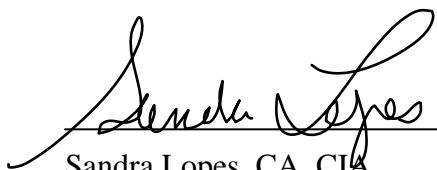
### Audit conclusion

The audit concludes that there are adequate and effective internal control procedures for deaccessioning private collections. However, a number of governance elements need improvement and policies and procedures need to be formalized to ensure a cohesive disposal approach in compliance with the terms and conditions agreed upon at acquisition.

### Statement of Assurance

This audit engagement was planned and conducted to be in accordance with the Internal Auditing Standards for the Government of Canada.

In my professional judgment as Chief Audit Executive, sufficient and appropriate procedures have been conducted and evidence gathered to support the accuracy of the conclusions reached and contained in this report. The conclusions were based on a comparison of the situations as they existed at the time of the audit and against the audit criteria.



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Library and Archives Canada

# AUDIT OF THE DEACCESSIONING OF PRIVATE COLLECTIONS

## INTRODUCTION

### Authority for the project

The Audit of the Deaccessioning of Private Collections was not originally part of the Audit Plan for 2010–2011. However, discussions held at the LAC Departmental Audit Committee meeting of December 15, 2010 led to a recommendation by the Deputy Head and Librarian and Archivist of Canada for undertaking this audit. The audit was added to the 2011–2014 Risk-Based Audit Plan.

### Background

Library and Archives Canada was created as a single entity in 2004, by the *Library and Archives of Canada Act* with a mandate to preserve the documentary heritage of Canada for the benefit of present and future generations. The *Report on Plans and Priorities* defines LAC's three main responsibilities as the following:

- acquisition
- preservation
- access to documentary heritage

Articles 8 and 9 of the *Act* describe the legislative mandate and powers of the Librarian and Archivist and his or her rights pertaining to the acquisition and the disposal of private and public archived materials.

Archived material is acquired through three main processes: Legal Deposit, within existing regulations, which require that published material be provided to LAC; the transfer of Government of Canada documents of enduring value; and the acquisition of private collections through donation or purchase. The deaccessioning of private collections is the subject of this audit. In the *LAC Corporate Control Manual*, which is part of the Rules for Archival Description (RAD) produced in 2006, deaccessioning is described as the transfer of records from the legal and physical custody of Library and Archives Canada. The disposal can take three forms: destruction of the collection, return to the donor, or transfer to another memory institution. The manner of disposal must respect the terms and conditions agreed to with the donor during the acquisition and negotiation phase. The Annual Report on the Disposition of Records reported 82 deaccessioning transactions processed in 2009–2010.

Currently, the function of deaccessioning is shared between two organizational units: the Society and Cultural Expression Branch (SCEB), under Acquisition, is responsible for decisions of deaccessioning private collections and the Analogue Preservation Branch, under Collections Management, executes the decisions.

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A collection may be one single item or it may be comprised of several items of varying types and values. A collection is identified as such because it comes from one single source or creator. Based on a list of collections registered in the MIKAN Collection Management System, there are currently 14,521 private collections at LAC, 2,330 of which are single and discrete items. In 2009–2010 there were 381 private collections received at LAC and registered in the MIKAN system. During the same period, 175 private collections were formally acquired. The great majority of private collections is held in three main LAC facilities, each providing approximately 17,000 square metres of space: the LAC Preservation Centre, the Renfrew Archives Centre, and 395 Wellington Street in Ottawa.

To remain relevant in a rapidly changing information environment, LAC is rethinking the way it does business. As a response to this challenge, LAC has embarked on a modernization exercise to develop a policy-driven and evidence-based global strategy. Twelve Modernization Innovation Initiatives (MII) will guide this exercise. Two of these initiatives will have a major impact on the acquisition and deaccessioning processes; they are MII 2, Whole of Society Model to Appraise and Acquire Documentary Heritage, and MII 4, Review the Relevance of LAC Holdings. The audit took place in this changing environment. It concludes on the measures in place during the testing period covered by the audit while ensuring that credit and consideration is given to recent and upcoming initiatives.

### Objective and Criteria

The objective of this audit was to determine if the governance process and internal control procedures for deaccessioning private collections are adequate and effective, and comply with the terms and conditions agreed to upon acquisition.

The audit criteria are based on the Core Management Controls and the risk assessment conducted during the planning phase of the audit. They are the following:

- An effective governance structure is established for the deaccessioning of private collections and the function is linked to acquisition and preservation strategies;
- The organization has a formal and rigorous approach to managing the deaccessioning of private collections;
- The approach to managing the deaccessioning of private collections risks is effective, well communicated and understood by management.

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## Scope

The audit field work was carried out from January to August 2011. The audit focused on the deaccessioning of private collection archived material that took place from November 1, 2009 to November 30, 2010. The audit encompassed the procedures to initiate, approve, and execute deaccessioning decisions and a high-level review of acquisition and preservation practices as they relate to deaccessioning.

## Methodology

The audit field work was conducted in accordance with the Policy on Internal Audit from the Office of the Comptroller General and the Treasury Board Policy and Guidelines, which stipulate that the Institute of Internal Auditors' standards apply to the Public Service sector. These standards require that the audit be planned and performed in such a way as to obtain reasonable assurance that the audit objective is achieved.

The audit included various audit procedures as considered necessary to provide such assurance. These included but were not limited to the following:

- Review of documentation such as policies, processes and work plans for the deaccessioning of private collections;
- Review and mapping of business processes and related internal controls;
- Interviews with key process owners and related personnel to obtain an in-depth view of the strengths and weaknesses of the deaccessioning activities;
- Benchmarking against other memory institutions for best practices on deaccessioning;
- Testing of twenty four (24) deaccessioning transactions, selected on a judgmental basis, for the period of November 1, 2009 to November 30, 2010 with a review of and vouching for supporting documentation. This provided a forty-two percent (42 %) coverage since the number of deaccessioning transactions completed at the time of audit amounted to fifty seven (57).
  - Selection was made based on a Report compiled by the Director General, SCEB, which represented the complete population of alienation transactions for the period covered.

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## OBSERVATIONS

### Governance

*Criteria: An effective governance structure is established for the deaccessioning of private collections and the function is linked to acquisition and preservation strategies.*

### **Several elements of the governance structure require improvement to become compliant with the Treasury Board Management Accountability Framework.**

Our assessment of the governance structure was based on the expectation that the following elements would be in place:

- Clearly defined and well-understood roles and responsibilities;
- Strategic direction in line with organizational priorities;
- Clearly stated objectives and work plans supporting the strategic direction;
- Regular reporting and monitoring on deaccessioning achievements;
- Clear linkage between acquisition and deaccessioning.

The authority for disposal of private collections is embedded in Section 9 of the *Library and Archives of Canada Act*. It reads as follows: “The Librarian and Archivist may dispose of any publication and record under his or her control, including by destruction, if he or she considers that it is no longer necessary to retain it. Any such disposition is subject to the terms and conditions under which the publication or record has been acquired or obtained.” Currently, there are two branches sharing the responsibility for deaccessioning. Based on their appraisal of a collection, the SCEB archivists make the decision relative to deaccessioning the collection or part of it. This decision is forwarded to the Analogue Preservation staff members who are responsible for executing the decision. Based on the interviews conducted with staff of both organizations, the roles and responsibilities are clearly defined and well understood and a climate of collaboration exists between the two organizations.

The mandate relative to deaccessioning is not currently supported by a clear strategic approach. Interviews conducted with program managers have confirmed that there is no overall strategic direction defining a cohesive and structured approach for the deaccessioning function and activities. Deaccessioning is not considered to be a program as such but a by-product of the acquisition process. Managers have confirmed that acquisitions are guided by a document approved by the LAC Management Board in 2005 entitled *Collection Development Framework*. This document provides the strategic direction and framework guiding the collection development for the period 2005–2010. It is supported by another document entitled *Acquisition Orientation 2006–2010*. Both are silent on the approach and requirements for the disposition of private collections.



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The primary mandate of archival institutions has historically been to acquire and preserve material of heritage value. The absence of a strategic direction for deaccessioning activities is a result of this legacy that is adverse to the disposal of archival material. Research of national and international practices on the deaccessioning of archival collections conducted by the LAC Strategic Research Branch has revealed that LAC is no different than most institutions in this domain. While most national archival institutions are enabled under their legislation to dispose of archival material, the parameters under which this is accomplished are largely open to interpretation and most institutions have not seen fit to elaborate strategies and/or policies to support this legislated mandate. The current modernization climate may present a unique opportunity for LAC to become the leader in deaccessioning policy and guidance.

In the absence of a deaccessioning strategy, there is a risk that the space and resources required to manage private collections are not used in the most efficient and effective manner.

There are no specific objectives and work plans related to the deaccessioning function. The work plans currently in place mostly cover activities related to collection appraisals and acquisitions. However, the 2011–2012 work plan for the SCEB concentrates on the MIIs and the relevant projects under the Branch's responsibility. In addition to the Branch's work plan, objectives and work plans are developed for each archivist and supervisor. Quarterly reports are prepared for reporting progress on ongoing and special projects. One of the major projects under way in the Political Archives section is the Excess Inventory Reduction Project aimed at clearing a large portion of the unprocessed private collections accumulated in the registry. This MII 4 project will, in fact, create a significant increase in deaccessioning activities until its completion. A separate Progress Report was prepared on the achievements of this project to date.

With the lack of specific objectives and work plans for deaccessioning, there is no assurance that collections are processed in the most efficient manner and according to set priorities.

The absence of specific objectives and work plans for deaccessioning impacts the ability to report and monitor activities. Currently, reporting for deaccessioning is limited to an annual report forwarded to the Deputy Head. This report provides the reason for disposal, the means of disposal and the date of the decision. In addition, managers indicated that performance measurement is limited and is not always taken into consideration in the decision-making process for the deaccessioning function. The high-level performance indicators developed for the organization's new Program Activity Architecture (PAA) in early 2011 provides a good starting point to refine

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indicators for each sector of activity and initiate the capture of valid and reliable data. Given the innovation initiatives under way, the timing may be ideal to establish a baseline from which to assess future performance. Limited information on program and key activity achievements negatively impacts the ability of managers to make well-informed decisions.

The function of deaccessioning is closely linked to that of acquisition and preservation and management has already identified some of the governance weaknesses raised above as part of its modernization challenges. The MII 2 initiative, Whole of Society Model to Appraise and Acquire Documentary Heritage, will revisit the need and appropriateness of a systematic holistic appraisal of archived materials and is expected to provide a strategic direction for acquisition in line with a total societal approach. MII 4, Review the Relevance of LAC Holdings, includes the reappraisal of the current collection to ensure its relevancy with the current mandate and conditions. It is expected that these initiatives will have a direct impact on deaccessioning activities by tightening the criteria for acquisition and disposing of excess inventory. Therefore, it is our opinion that a direct link between acquisition and deaccessioning exists.

### **Recommendations:**

1. LAC should integrate the deaccessioning function as part of the approach to be developed for Appraisal and Acquisition of Documentary Heritage and for the ongoing review of the relevance of its holdings including:
  - An overall strategic direction;
  - Documented policies and procedures;
  - Specific objectives, work plans and reporting structure;
  - Risk factors to guide the prioritization of the treatment of collections;
  - Performance indicators.

### **Management response:**

LAC's Acquisition Sector agrees with this recommendation: the Whole of Society Methodology currently under development will provide the framework for the integration of this approach. The deaccessioning function can be integrated into the acquisition function cluster. This will provide the appropriate framework to set a direction, and will trigger the development of policies, procedures, objectives and risk identification.

It is worth noting that it is LAC's intention to intervene with creators "up-stream" in the process, i.e. to have potential collection material identified and assessed as much as

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possible before its arrival on LAC's premises. Success in this approach will translate into a smaller percentage of material deaccessioned at the point of acquisition, i.e. unwanted material will be identified prior to receiving. This comment does not pertain to the retrospective review of existing holding (MII 4).

It should be reiterated also that a strategic, comprehensive approach to reappraisal and deaccessioning is the objective of MII 4. Under this Modernization initiative, LAC will design and implement such an approach by April 1, 2014.

### Process

*Criteria: The organization has a formal and rigorous approach to managing the deaccessioning of private collections.*

**Although there are limited documented policies and procedures, deaccessioning activities are governed by a set of established criteria and a formal approval process.**

Our assessment of the adequacy of the deaccessioning process was based on the expectation that the following elements would be in place:

- Deaccessioning policies and procedures are in place, well documented and effective;
- There are clear criteria supporting deaccessioning decisions;
- Delegation authorities are in place for a rigorous approval process.

The deaccessioning process is an integral part of the acquisition process and to understand the former, one must understand the latter. Acquisition is divided into two phases:

- **Registration**  
Once the Director General, SCEB authorizes an Acquisition Proposal, the collection is physically acquired and transferred to LAC premises. The collection is then entered by the Record Control Officer (RCO) into the MIKAN registry and containers are identified with a bar code system to enable tracking and easy retrieval of archival material. At this point in time, the content and value of the collection are not fully known.
- **Acquisition**  
This phase can best be described as the appraisal and negotiation phase. Following transfer to LAC premises, the archivist conducts a physical review and appraisal of the collection to determine if it meets the LAC acquisition and preservation criteria. If the collection or some part of it does not meet the criteria, a

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deaccessioning action is taken. The proposed action, destruction, return to donor, or transfer, is based on the terms and conditions that have been agreed to with the donor during negotiations.

At any point in time during these two phases, a Deed of Gift may be signed. The Deed of Gift is a legal and binding contract between the Crown and the donor and it formalizes the acquisition of the collection by LAC. It is usually accompanied by an Annex describing the details of the collection. Following acquisition and/or deaccessioning actions, the final step is to update the description of the collection in the MIKAN database in accordance with the Rules for Archival Description (RAD).

The *LAC Archival Collection Management Reference Manual*, last updated in 2008, provides selection criteria for acquisition of archival records. Decision makers are required to consider such criteria as: the creator (individual or corporate), the medium, the uniqueness or originality of the content, the value for researchers and the artistic or aesthetic value, to name only a few. In addition to those guidelines, archival norms as recommended by the Association of Canadian Archivists and the professional judgment of archivists have guided the decision-making and documentary process. Until very recently, the portfolio model prevailed at LAC whereby one or more archivists were responsible for a collection and, therefore, made the decisions relative to acquisition and deaccessioning. This model created areas of special expertise where challenge was limited. In this environment, management considered that there was no need to issue a detailed policy for the deaccessioning of private collections.

In spite of the lack of formal policy, there are controls in place to ensure that the deaccessioning transactions are processed in an effective and timely manner. The process was tightened during the last year to provide better control. Follow-up systems were put in place to ensure tracking and timely processing of transactions. In addition, the Recommendation for Disposition form was improved to include an Annex describing in greater details the collection to be disposed of and copies of the disposal documentation was required as final proof of disposal. Finally, summary procedures and service standards were developed by the two branches involved in the process and they were promulgated.

The limited policies and informal procedures could result in an uneven application of deaccessioning measures and increase the risk of errors.

Following their appraisal, archivists make recommendations for disposal of private collection items. There are three different forms used to initiate such an action. The first form is the most commonly used for archived material meeting one of the following deaccessioning criteria:

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- Material not meeting acquisition criteria<sup>1</sup>;
- Duplicate material not needed;
- A condition to return to donor as agreed at acquisition;
- An obsolete or unsafe format.

If one or more of the above mentioned criteria are met, the archivist completes the Recommendation for Disposition of Records form, which is authorized by the Director General, SCEB.

The second form, which must be approved by the Deputy Head and Librarian and Archivist of Canada, is used for deaccessioning actions that do not meet the criteria required for the first form. One such situation would be the transfer of archived material to another memory institution. The third form, which is authorized by the supervisor of the recommending archivist, is used for collections that are in the registry but that remain unprocessed.

The use of the proper form is monitored by the SCEB Standard Officer as evidence in a case where the Officer identified the use of the wrong form and requested that the archivist use the proper form. All requests are then forwarded to the Inventory Control and Accommodation Section, under Analogue Preservation, for processing.

The test revealed that the deaccessioning process in place at the time of audit was followed in all cases and proper authorization was obtained. In our opinion, there are clear criteria guiding the deaccessioning process.

The delegation to the Director General, SCEB for authorizing disposition under the above-mentioned criteria expired on March 31, 2011. This has created delays and, at the time of audit reporting, only nine deaccessioning transactions had been processed since April 1, 2011, all authorized by the Deputy Head and Librarian and Archivist of Canada or the responsible supervisor.

It is a well-known fact that a significant backlog of private collections has accumulated in the LAC vaults and has been doing so for several years. The MIKAN registry reports that 5,330 archival records received at LAC since 1998 remain unprocessed. This represents 99,427 containers. One impact is inefficient use of space and resources. While there may be legitimate factors and reasons to justify the delay in some cases, this situation points to the lack of a strategic and systematic approach to processing private collections for acquisition and deaccessioning.

The excess inventory issue has been recognized by management and the MII 4 includes a project to clear this backlog on a priority basis. There is a requirement for developing

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<sup>1</sup> Based on the Archival Collection Management Reference Manual

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a formal policy that will define criteria for prioritizing the processing of the private collections and establishing deaccessioning procedures with built-in timelines. In addition, proper delegation should be in place to ensure that deaccessioning is conducted effectively and on a timely basis.

### **Recommendations:**

2. Review the effectiveness of the current delegation of authority process for deaccessioning actions.

### **Management response:**

LAC's Acquisition Sector agrees with this recommendation. In the context of an unprecedented emphasis on the review of existing holdings, delegation will be reviewed in coordination with Holding Management Sector to ensure consistency in delegation, but also appropriate overview until this relatively new process matures, and lessons learned be integrated into the delegation instrument.

## **Risk Management**

*Criteria: The approach to managing the deaccessioning of private collections risks is well communicated, and understood by management.*

### **There is currently no risk management framework in place for activities relative to deaccessioning.**

Our assessment of the adequacy of the risk management approach was based on the expectation that the following elements would be in place:

- There is a documented and well-understood risk assessment approach for the deaccessioning function;
- Risks relative to the deaccessioning process have been identified and mitigating measures have been developed;
- Mitigating strategies are implemented, well understood and communicated.

The Analogue Preservation Branch has developed a Risk Management Framework for the collections under its custody. The framework defines the various agents of deterioration, the risk level for each agent and the mitigating measures in place. The Branch has also defined the preservation issues relative to analogue holdings. However, these documents concern the preservation of analogue holdings currently in the custody of the Branch and have a limited impact on SCEB acquisition activities.

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Although, in cases where the ability to preserve the collection is doubtful, archivists may consult with the responsible collection managers prior to acquisition.

Managers of the SCEB have indicated that there is currently no Risk Management Framework for managing the acquisition function or the resulting deaccessioning activities. The prevalent opinion is that the risks related to deaccessioning are very small. The penultimate risk of destroying a collection that should have been kept is considered almost nil. Given the archival culture, if there is any doubt about destroying a collection, the collection will be kept. In addition, the current approval process for deaccessioning described in the previous section provides effective mitigating measures.

However, management acknowledges the need to better identify the risks relative to acquisition and deaccessioning as demonstrated in the Project Charter for the MII 4 in which the most relevant risks have been identified.

**There is a need to formalize the deaccessioning process to ensure that it is conducted in accordance with the terms and conditions agreed to with the donor as required in the *Act*.**

The *Act* stipulates that “disposition is subject to the terms and conditions under which the publication or record has been acquired or obtained.” Following the collection appraisal and negotiation phase, the archivist and the donor agreed on arrangements to acquire, dispose of, and/or transfer the collection or parts of it. Until now, those arrangements were not part of the Deed of Gift signed between LAC and the donor. There was no consistency in the way the arrangements were recorded. In many cases they were contained in letters to the donor or collection agreements signed between LAC and the donor. However, they were sometimes limited to verbal agreements. Recognizing the limitations of these arrangements, the SCEB staff indicated that in all cases of deaccessioning they communicate with donors to obtain their agreement with the proposed disposition procedures.

While this situation may not have caused serious problems to date, the proposed projects under MII 4 will increase the risk of disposing of a collection without knowing the exact terms and conditions agreed to with the donor. The scope of the MII 4 initiative “...includes all measures necessary to support the design and implementation of a reappraisal program, from the articulation of policy strategies and the developments of new protocols for disposal, return to donors/creators and long term loans. This MII encompasses all unprocessed and permanent LAC holdings.”<sup>2</sup>

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<sup>2</sup> Modernization Innovation Initiative # 4 Project Charter

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The ability to determine accurately the terms and conditions agreed upon at the time of acquisition may be difficult for those acquisitions completed several years ago. Therefore, the reappraisal of the permanent collection and the resulting deaccessioning actions may not always be compliant with the terms and conditions as required by the *Act*.

The Excess Inventory Reduction Project has helped crystallize this issue and the section responsible for Political Archives in SCEB has implemented some mitigating measures. To demonstrate that a reasonable effort was made to contact the donor, the staff members of Political Archives developed a number of instruments, checklist, detailed procedures and template letters to ensure that permission is granted by the donors or their successors prior to any disposition action taking place.

The current Deed of Gift states clearly that LAC was “to have and to hold the material” of the collection with no clause relative to disposal. This problem has been recognized and SCEB is in the process of developing a new Deed of Gift, which specifies clearly the arrangements between LAC and the donor regarding, amongst other things, conditions relative to disposal. There is no set implementation date for this new contract document.

In our opinion, there is a need to bring rigour to the deaccessioning process to clearly define the circumstances under which it will be undertaken and the procedures to be followed, particularly in cases of material acquired in the distant past.

<b>Recommendations:</b>
3. Ensure that deaccessioning of archival material is conducted in compliance with the terms and conditions agreed to or renegotiated with the donors, and that future terms and conditions are consistently documented.
<b>Management response:</b>
LAC’s acquisition sector agrees with this recommendation, and that greater clarity be obtained in the dealings with donors. It is worth noting that the existing Deed of Gift covers specifically material retained by LAC, if need be legal advice will be sought to cover conditions for return/disposal of material.



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### APPENDIX A – MANAGEMENT ACTION PLAN

Recommendation	Action	Responsibility	Deadline
<p>1. LAC should integrate the deaccessioning function as part of the approach to be developed for Appraisal and Acquisition of Documentary Heritage and for the ongoing review of the relevance of its holdings including:</p> <ul style="list-style-type: none"> <li>• An overall strategic direction</li> <li>• Documented policies and procedures</li> <li>• Specific objectives, work plans and reporting structure</li> <li>• Risk factors to guide the prioritization of the treatment of collections</li> <li>• Performance indicators</li> </ul>	<ul style="list-style-type: none"> <li>• Integrate with Whole of Society Methodology (WoSM) in relation to LAC documentary intent</li> </ul>	DG SCE	Dec. 15, 2011
	<ul style="list-style-type: none"> <li>• Integrate with Directives related to WoSM</li> </ul>	Dir. Cultural Heritage	March 31, 2012
	<ul style="list-style-type: none"> <li>• Develop in light of WoSM</li> </ul>	Dir. Digital Resources	Sept. 30, 2012
	<ul style="list-style-type: none"> <li>• Identification and categorization related to WoSM</li> </ul>	Dir. Information Resource Selection	Dec. 15, 2011
	<ul style="list-style-type: none"> <li>• Develop in collaboration with corporate indicators</li> </ul>	DG SCE	Sept. 30, 2012
	<p>MII4 will design and implement an approach for ongoing review and deaccessioning of LAC Holdings that are no longer relevant.</p>	DG Analogue Preservation	April 1 <sup>st</sup> , 2014

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Recommendation	Action	Responsibility	Deadline
2. Review the effectiveness of the current delegation of authority process for de-accessioning actions.	Review in collaboration with Analog Preservation Branch and make recommendations	DG SCE	Dec. 15, 2012
3. Ensure that de-accessioning of archival material is conducted in compliance with the terms and conditions agreed to or renegotiated with the donors and that future terms and conditions are consistently documented.	Review existing standard Deed Review in light of new Access Policy (under development)	Dir. Political and Social	March 31, 2012

## AUDIT OF THE DEACCESSIONING OF PRIVATE COLLECTIONS

### APPENDIX B: - RISK RANKING OF RECOMMENDATIONS

The following table presents the recommendations and assigns risk rankings of high, medium or low. Risk rankings were determined based on the relative priorities of the recommendations and the extent to which the recommendations indicate non-compliance with *Library and Archives of Canada Act* and Treasury Board policies.

Recommendations	Priority Level
<p>1. LAC should integrate the deaccessioning function as part of the approach to be developed for Appraisal and Acquisition of Documentary Heritage and for the ongoing review of the relevance of its holdings including:</p> <ul style="list-style-type: none"><li>• An overall strategic direction</li><li>• Documented policies and procedures</li><li>• Specific objectives, work plans and reporting structure</li><li>• Risk factors to guide the prioritization of the treatment of collections</li><li>• Performance indicators</li></ul>	Medium
<p>2. Review the effectiveness of the current delegation of authority process for deaccessioning actions.</p>	Medium
<p>3. Ensure that deaccessioning of archival material is conducted in compliance with the terms and conditions agreed to or renegotiated with the donors, and that future terms and conditions are consistently documented.</p>	High