### **Project Report**

**Physical Records Survey 2017** 



Public Record Office Victoria



### Contents

List	t of Tables	3
1	Executive summary	4
2	Project background, goals and methodology	5
3	Quantities of physical records	6
4	Findings	8
5	Recommendations	10
6	Question responses	11

### List of Acronyms

EDRMSElectronic Document and Records Management SystemPROVPublic Record Office Victorian

RDA Retention and Disposal Authority

# **List of Tables**

Tab	Tables		
1	Number of responding agencies in each sector	5	
2	Total estimated kms of records held by the 81 agencies which supplied quantities	6	
3	Total estimated kms of records held across the Victorian public sector	6	
4	Estimated kms permanent and temporary value records whole of Victorian public sector	7	
5	Estimated kms physical records still held in agencies, created at different times	7	
6	Risk management methods used for physical records	11	
7	Sentencing and disposal plans	11	
8	Agencies reporting records created before 1900	12	
9	Pre-1900 Catalogued Records	12	
10	Types of records created pre-1900 held by agencies	13	
11	Storage formats of records created pre-1900	13	
12	Storage locations of records created pre-1900	14	
13	Percentage of surveyed agencies holding records created 1900-1985	15	
14	Types of records stored 1900-1985	15	
15	Storage formats of 1900-1985 records	16	
16	Plans to transfer records to PROV	16	
17	Timeframes for transfer	17	
18	Issues and barriers for agencies not including all permanent records in transfer plan	17	
19	Priority transfers	18	
20	Availability of records created before 1985	18	
21	Digitisation Projects	18	





# **1** Executive summary

The 2017 Physical Records Survey was undertaken by PROV to obtain information from a broad selection of Victorian Government agencies about the older physical records they are holding. The survey focussed on records still held by agencies which were created pre-1900 and from 1900-1985. Online surveys were sent to 200 agencies and 83 agencies provided responses to the questions and 81 provided information about the quantity of their holdings.

The objective of this survey is to use the information to assist agencies and PROV in their storage, disposal and transfer planning and practices. As well as determining quantities, formats and storage arrangements of older physical records held by agencies, the survey sought to gain an understanding of agency intentions in regard to disposal and transfer and the barriers and challenges to undertaking these activities.

26 local government councils reported that they had a combined total of 0.273 kms pre-1900 records and 7.432 kms records dating from 1900-1985. Using these figures, it is estimated that local government across Victoria is holding 1.24 kms of pre-1900 records and 33.92 kms records dating from 1900-1985.

55 other Victorian public sector agencies reported that they had a combined total of 0.547 kms pre-1900 records and 168.879 kms records dating from 1900-1985. Using these figures, it is estimated that these other sectors, which comprise most (but not quite all) of the rest of the Victorian public sector, hold 1.92 kms of pre-1900 records and 409.66 kms of records dating from 1900-1985.

From this, a very conservative estimate<sup>1</sup> (acknowledging that there are gaps in coverage) is that the Victorian public sector is holding 3.16kms pre-1900 records, of which 95% or 3 kms are likely to be of permanent value, and 443.58 kms records dating from 1900-1985, of which 10% or 44 kms are likely to be of permanent value. This supports the findings from the 2015 PROV Physical Record Survey<sup>2</sup>.

Other key findings are that:

- There is a huge quantity of physical records still held in agencies;
- Many of these records should have been transferred to PROV and many could have been legally destroyed, meaning that agencies are paying for unnecessary storage, critical records are being placed at risk and the community is not able to easily access records of state significance;
- A substantial number of agencies holding records created prior to 1900 do not know what they consist of and are storing them in conditions which place them at risk of loss, damage or theft;
- Record disposal and transfer programs are not adequately planned or resourced in many agencies. Resourcing is the main barrier reported by agencies to transferring permanent records to PROV custody. This would appear to mean that many agency heads are not fulfilling their obligations under the *Public Records Act 1973*;
- Many agencies do not use standard risk management methods or tools for managing risks to physical records.

Key recommendations resulting from the survey findings are that PROV should campaign for effective record disposal programs in agencies, further investigate government holdings, monitor the effectiveness of and continue to improve guidance products while agencies should ensure they have effective and adequately resourced disposal and transfer programs in place.

<sup>&</sup>lt;sup>1</sup>This estimate has been made by dividing the quantity of physical records held by the number of FTE for the agencies which responded to the survey, then multiplying this quantity by the number of FTE across the Victorian public sector.

<sup>&</sup>lt;sup>2</sup> The 2015 PROV Physical Survey was used to estimate that there are 800 kms of pre-2015 physical records held across the Victorian public sector, of which 80 kms are of permanent value.

# 2 Project background, goals and methodology

The Public Record Office Victoria (PROV) has an active physical transfer program, accepting the transfer of approximately 2 kms (10,000 boxes) of permanent value records each year. Over the last few years PROV has focussed on prioritising transfer of the highest value records and revising and improving the guidance and tools it provides to agencies.

The PROV Physical Record Survey 2017 follows several surveys conducted by PROV since 2017. This survey targets records created pre-1900 and between 1900-1985.

The objective of this survey is to use the information to assist agencies and PROV in their storage, disposal and transfer planning, in order to:

- Minimise costs for agencies;
- Ensure that records of continuing value are preserved and accessible;
- Assist agencies and PROV transition from physical to digital records management; and
- Enable PROV to target its transfer program to work with agencies holding the highest priority records, particularly those at risk of loss or damage.

The methodology followed was to use the Victorian Public Sector Commission sector breakdown to identify sectors across the Victorian public service, identify a range of organisations within each sector and then send the online survey to those selected organisations.

The survey was sent to 200 organisations, with the result that:

- 83 organisations responded to the survey;
- Of these, 81 organisations were able to supply estimates of the quantities of pro-1900 and 1900-1985 physical records they hold.

#### Table 1 Number of responding organisations in each section

Number of responding organisations in each sector			
Sector	No which responded to the survey	No which supplied an estimate of quantities	
Local government councils	27	26	
Departments	7	6	
Health	13	13	
Water	12	12	
Education Institutions	6	6	
Other	18	18	
Total	83	81	

Surveys were sent to a number of agencies within the land management and planning, regulatory and transport sectors but no responses were received.



# **3** Quantities of physical records

#### Quantities held by the 81 agencies which supplied this information

#### Table 2 Total estimated kms of records held by the 81 agencies which supplied quantities

Total KMs of records held (estimated by the organisations)		
Organisation Type	Estimated KMs pre-1900 records	Estimated KMs 1900-1985 records
26 local government councils which responded	0.273	7.432
55 other agencies which responded	0.547	168.879
Total	0.82	176.311

#### Estimates made for whole of Victorian public sector

The above figures were then used to estimate the quantities of records held across the entire Victorian public sector. This estimate has been made by dividing the quantity of physical records held by the number of FTE for the agencies which responded to the survey, then multiplying this quantity by the number of FTE across the Victorian public sector.

Total KMs of records held (estimated) across the Victorian public sector			
Туре	Estimated KMS pre-1900 records	Estimated KMS 1900-1985 records	Methodology for calculations
Council	1.24	33.92	26 Councils, with a total FTE of 7,343 responded to the survey stating that they had 273m pre-1900 records and 7,432m 1901-1985 records. So for each FTE this averages .037m of pre1900 and 1.01m of 1900-1985 records. All Councils have a combined total 33,590 FTE, so this FTE x .037m pre-1900 records = 1,246m or 1.24kms. And 33,590 FTE x 1.01m 1900-1985 records = 33,925m or 33.92km.
Other Victorian public sector agencies	1.92	409.66	55 other agencies with a total FTE of 65,248 responded to the survey stating that they had 547m pre-1900 records and 168,879m 1901- 1985 records. So for each FTE this averages .008m pre-1900 records and 2.58m 1900-1985 records. For all of these sectors combined, the total FTE is 158,784 , so this FTE x .008m pre-1900 records = 1,270m or 1.27km. And 158,784 x 2.58m 1900-1985 records =409,662m or 409.66kms.
Total	3.16km	443.58	

#### Table 3 Total estimated kms of records held across the Victorian public sector

Note – this must be considered an under-estimate as representative organisations from the land management and planning, regulatory and transport sectors did not respond to the survey.

Of the 3.16kms of pre-1900 records, it is estimated that 95% or 3kms would be of permanent value. Of the 443 kms of records created between 1900-1985, it is estimated that 10% or 44 kms would be of permanent value.<sup>3</sup>

#### Table 4 Estimated kms permanent and temporary value records for whole of Victorian public sector

Total KMs of records held (estimated by the organisations)		
Organisation Type	Estimated KMs permanent records	Estimated KMs temporary records
Pre-1900	3 (95%)	0.16 (5%)
1900-1985	44 (10%)	399 (90%)
Total	47	399.16
Combined total 446		16

This supports the results of the 2015 Physical Record Survey conducted by PROV which were used to estimate that the Victorian public sector was holding 800 kms of pre-2015 physical records, of which 10% or 80kms were of permanent value. An increase in holdings from 446 kms in 1985 to 800 kms in 2015 seems reasonable, given the "information and paper explosion" in this era caused by personal computers, printers and photocopiers.

#### Table 5 Estimated kms physical records still held in agencies, created at different times<sup>4</sup>

800 KMs of records held in agencies, created pre-2015			
Permanent = 80 kms			
Temporary = 720 kms			
3.16 kms still in agencies created pre-1900443.58 kms still in agencies created 1900-1985353.26 kms still in agencies created 1986-2014			

<sup>&</sup>lt;sup>4</sup> The pre-2015 quantity of 800 kms is taken from the 2015 PROV Physical Survey



<sup>&</sup>lt;sup>3</sup> For current records it is estimated that 3% are of permanent value but this percentage increases the older the records are, as some low value / ephemeral records are discarded over time.

# 4 Findings

Key findings and their consequences	Evidence for these findings from the responses
There is a huge quantity of physical records still held in agencies. This includes a large quantity of permanent records created more than 30 years ago (very conservative estimate of 47kms). It is highly likely that most of these records should have been transferred to PROV by the agencies. It also includes a large quantity of temporary records created more than 30 years ago (very conservative estimate of 399 kms). It is highly likely that many of these records could be legally destroyed. This means agencies are unnecessarily spending money on storing physical records. Retrieval and access to records is impeded by the massive quantities being held unnecessary. Agencies are incurring risks in relation to the loss or damage of permanent records and the inappropriate retention/disclosure of information.	<ul> <li>81 agencies reported 0.82 kms pre-1900 records and 176.3 kms 1900-1985 records</li> <li>95% or 0.78 kms of pre-1900 records and 10% or 17.6 kms 1900-1985 records held by the 81 responding agencies are estimated to be permanent</li> <li>There is an estimated 47 km backlog of pre-1985 permanent records held by Victorian public sector agencies. While some of these may still be required by agencies for their current use, the likelihood is that most of these records should be transferred.</li> <li>This rises to an estimated 80 kms of pre-2015 permanent records held by Victorian public sector agencies. (results from 2015 PROV Survey).</li> <li>There is an estimated 399 kms of pre-1985 temporary records held by Victorian public sector records. While some of these records will be subject to longer legal retention periods, the likelihood is that many of these records could be legally destroyed.</li> <li>This rises to an estimated 720 kms of pre-2015 permanent records held by Victorian public sector agencies. (results from 2015 PROV Survey).</li> </ul>
Many agencies do not have a good understanding of the pre-1900 records they are holding. Most pre-1900 records are very unlikely to be required by the agencies for administrative purposes (they are at least 117 years old). This is placing them at risk of loss or damage and means they are not easily accessible to researchers and the community.	<ul> <li>10% of agencies are unsure whether they hold pre- 1900 records</li> <li>only 14 of the 36 agencies holding pre-1900 records stated that they were catalogued, listed or managed in a record keeping system.</li> </ul>
A substantial number of agencies reported holding pre- 1900 records in storage arrangements which place them at risk of loss, damage or theft. This is placing a critical part of Victoria's heritage at risk. A small number of agencies reported contravening PROV Standards by storing pre-1900 records with non-certified commercial providers.	<ul> <li>43% of agencies reported holding pre-1900 records</li> <li>1 agency reported storing pre-1900 records in a shipping container, 7 in sheds or warehouses and 7 in basements.</li> <li>3 agencies reported using non PROV-approved commercial storage providers to hold pro-1900 records, so are contravening PROV Standards.</li> <li>18 agencies reported that they are holding pre-1900 records in storage spaces that may be insecure or unsafe for record storage.</li> </ul>

Key findings and their consequences	Evidence for these findings from the responses
Resourcing is the main barrier to transfer reported by agencies. Record disposal and transfer programs are not adequately planned or resourced in many agencies. Two thirds of agencies surveyed report not having a sentencing and disposal plan or equivalent for physical records. Only a little more than half the agencies reported that they have plans to transfer permanent records to PROV. This would appear to mean that many agency heads are not fulfilling their obligations under the <i>Public Record Act (Vic) 1973.</i>	<ul> <li>The main reason given for not transferring records to PROV was a lack of resources in agencies (25% of agencies reported this).</li> <li>65% of agencies report not having a sentencing and disposal plan or equivalent for physical records.</li> <li>A little over half (44 / 83) agencies reported that they have plans to transfer records to PROV, with an additional 21 agencies reporting that they "maybe" have plans for this.</li> <li>But, in contradiction to this, 58 / 83 agencies reported that they plan to transfer records to PROV within 10 years.</li> </ul>
Many agencies do not appear to use standard risk management methods and tools for physical records. This may mean the methods and tools are in place but that physical records are not included. Likely consequences of this are that critical records are at risk of loss or damage and that sensitive information is at risk of inappropriate disclosure.	<ul> <li>Only 43/83 agencies reported using a Disaster Management and Recovery Plan as a method/tool for managing risks associated with physical records.</li> <li>Only 37/83 agencies reported using a Risk Register as a method/tool for managing risks associated with physical records.</li> <li>Only 16/83 agencies reported using an Information Asset Register as a method/tool for managing risks associated with physical records.</li> </ul>





# **5** Recommendations

The following recommendations are made in response to the findings:

#### PROV:

- 1. Should campaign to communicate the benefits of effective record disposal management and the risks and costs of not managing records properly from creation to disposal. As part of this, PROV should communicate to agencies their responsibility for planning and budgeting for adequate records management, including for disposal and transfer. This campaign should be aimed at the executive level, with tools and materials available online to assist agencies to implement improvement activities.
- 2. Should continue to investigate Victorian public sector record holdings, particularly in respect to pre-1900 records and permanent records which may be at risk of loss or damage due to storage arrangements etc.
- 3. Has revised the Disposal Standard and Specifications and provided simpler guidance tools. PROV should monitor their effectiveness and continue to improve the guidance products offered.
- 4. Should consider how best to help agencies source the knowledge and skills required for identifying, preparing and documenting records for transfer.
- 5. Prioritises the transfer of agency records according to risk and value and should continue to follow this approach.

#### Agencies:

- 6. Should ensure they know the content of their record holdings, the legal retention periods for them and that they are able retrieve the information they need.
- 7. Should ensure that records are properly managed and stored to ensure they are not at risk of loss, damage or inappropriate access.
- 8. Should ensure they have properly resourced and planned record disposal and transfer programs, so that storage costs are minimised and significant information is preserved and accessible for as long as required. This includes planning and resourcing the transfer of permanent records to PROV when appropriate to form part of the state archival collection.

# **6** Question responses

#### Organisations

Question 1: Asked for details of the organisation and the person completing the survey

#### **Records Management Program**

Question 2: What methods and tools does your agency use to manage risks associated with your physical records

Table 6 Risk management methods used for physical records

What methods and tools does your agency use to manage risks associated with your physical records?			
Answer Options	Number saying yes	% of 78 agencies which responded	
Disaster Management & Recovery Plan	43	55.1%	
Risk Register	37	47.4%	
Information Asset Register	16	20.5%	
(Electronic) Document and Records Management System	65	83.3%	
Records Management Policy	67	85.9%	
Records Disposal Policy	39	50%	
Records and Disposal Authority	64	82.1%	

5 agencies skipped this question and 13 added comments, mainly describing additional ways in which risks to physical records are managed ie business rules, vital records list etc. One respondent explained that they do not have a separate Records Disposal Policy, as this forms part of the Records management Policy.

#### **Question 3: Sentencing and Disposal Plan**

35% of responding agencies report having a sentencing and disposal plan or equivalent.

#### Table 7 Sentencing and disposal plans

Do you have a sentencing and disposal plan or equivalent for physical records?			
Answer Options Response Percent Response Count			
Yes	34.9%	29	
No	65.1%	54	
Total	100%	83	



#### **Pre-1900 Record Holdings**

Question 4: Does your organisation store any records created before 1900?

#### Table 8 Agencies reporting records created before 1900

Does your organisation store any records created before 1900?			
Answer Options Response Percent Response Count			
Yes	43.4%	36	
No	45.8%	38	
Unsure	10.8%	9	
Total	100%	83	

#### Question 5: Are the records created before 1900 catalogued, listed or managed within a record keeping system?

#### Table 9 Pre-1900 Catalogued Records

Are the records created before 1900 catalogued, listed or managed within a record keeping system?		
Answer Options	Response PercentResponse Count(of those which answered)	
Yes	35.0%	14
No	12.5%	5
Some are catalogued and some are not	52.5%	21
Answered question		40
Skipped question 43		43

22 comments were received from agencies, mainly outlining the systems used to document and manage the records.

Question 6: What types of records created before 1900 do you store? Please check any of the following that apply.

 Table 10 Types of records created pre-1900 held by agencies

What types of records created before 1900 do you store? Please check any of the following that apply.		
Answer Options	Response Percent (of those which answered)	Response Count
Volumes e.g. registers and ledgers	83.8%	31
Files e.g. correspondence, personnel, case files	40.5%	15
Cards e.g. index and registration cards	29.7%	11
Maps and plans e.g. charts, drawings, specifications, blueprints, elevations, layouts	45.9%	17
Photos e.g. photographic prints, glass plates	40.5%	15
Answered question		37
Skipped question – note this should include the 38 agencies which does not have pre-1900 records and the 9 agencies which are unsure		46

#### Question 7: How are your types of records created before 1900 stored?

#### Table 11 Stored formats of records created pre-1900

How are your types of records created before 1900 stored?		
Answer Options	Response Percent (of those which answered)	Response Count
Standard acid free archival box 18cm W x 40cm D x 26cm H	42.1%	16
Commercial storage box 45cm W x 40cm D x 26cm H (as supplied by APROSS)	28.9%	11
Flat maps or plans	31.6%	12
Rolled maps or plans	31.6%	12
Plate frames	5.3%	2
Other (please specify)	73.7%	28
	Answered question	38
Skipped question – note this should include the have pre-1900 records and the 9	-	45



Question 8: Where are your records created before 1900 stored? Check any of the following that apply.

 Table 12 Storage locations of records created pre-1900

Where are your records created before 1900 stored? Check any of the following that apply.		
Answer Options <sup>5</sup>	Response Count	
CBD office space	10	
Divisional or Regional office space	9	
Approved Public Record Office Storage Supplier (APROSS)	13	
Other Commercial Storage Provider	3	
Shipping Container	1	
Shed or Warehouse	7	
Basement	7	
Other	10	
Agencies which stated that some storage spaces may be insecure or unsafe for records storage	18	
Answered question	38	
Skipped question – note this should include the 38 agencies which do not have pre-1900 records and the 9 agencies which are unsure	45	

### Question 9: What is the quantity of records (in linear metres) created before 1900 being stored by your organisation.

See Section 3 for details

#### Question 10: How confident are you in the accuracy of your linear meterage quantity.

Respondents were asked to rate their confidence between 1 (very low) and 5 (very high). The average response rate was 4.5.

<sup>&</sup>lt;sup>5</sup> Type names can be misleading. One of the agencies which stated their pre-1900 records were stored in a shed, then described it as a "purpose built archive shed, with an internal structure for permanent records with a 2 hour fire rating and temperature control via floor heating". Another respondent stated that they held pre-1900 records in a basement but then explained it contained a "climate controlled and secure archive storage room."

#### Records created 1900-1985

Question 11: Does your organisation store records created between 1900-1985.

#### Table 13 Percentage of surveyed agencies holding records created 1900-1985

Does your organisation store physical records created 1900-1985?		
Answer Options Response Percent Response Count		
Yes	89.2%	74
No	10.8%	9
Answered question		83
Skipped question		0

#### Question 12: What types of records 1900-1985 do you store?

#### Table 14 Types of records stored 1900-1985

What types of records 1900-1985 do you store?		
Answer Options	Response Percent	Response Count
Volumes e.g. registers and ledgers	80.0%	56
Files e.g. correspondence, personnel, case files	87.1%	61
Cards e.g. index and registration cards	55.7%	39
Maps and plans e.g. charts, drawings, specifications, blueprints, elevations, layouts	72.9%	51
Machine readable e.g. films, audio visual recordings, computer discs, microfiche	42.9%	30
Photos, negatives, magnetic tapes (these require cold storage for long-term preservation)	50.0%	35
Other (please specify)	15.7%	11
	Answered question	70
Skipped question – should include the 9 which did not have any		13



#### Question 13: How are your types of records 1900-1985 stored?

#### Table 15 Storage formats of 1900-1985 records

How are your types of records created 1900-1985 stored?		
Answer Options	Response Percent (of those which answered)	Response Count
Standard acid free archival box 18cm W x 40cm D x 26cm H	61.43%	43
Commercial storage box 45cm W x 40cm D x 26cm H (as supplied by APROSS)	68.5%	48
Flat maps or plans	47.14%	33
Rolled maps or plans	48.57%	34
Canisters for films, photos, magnetic tape etc	20%	14
Other (please specify)	44.29%	31
	Answered question	70
Skipped question – note this she which re	ould include the 9 agencies port they do not store any	13

### Question 14: What is the quantity (in linear metres) of records 1900-1985 being stored by your organisation. If unsure please provide your best estimate.

See section 3 Quantities of physical records for details

#### Question 15: How confident are you in the accuracy of your linear meterage quantity?

Respondents were asked to rate their confidence between 1 (very low) and 5 (very high). The average response rate was 4.8.

#### **Transfer to PROV**

Question 16: Do you have plans to transfer to PROV?

Table 16 Plans to transfer records to PROV

Do you have plans to transfer permanent records to PROV?		
Answer Options	Response Percent (of those which answered)	Response Count
Yes	55.0%	44
No	18.8%	15
Maybe	26.3%	21
Answered question 80		80
	Skipped question	3

#### Question 17: What are your timeframes for transfer to PROV?

#### **Table 17 Timeframes for transfer**

What are your timeframes for transfer to PROV?		
Answer Options	Response Percent (of those which answered)	Response Count
Within 1 year	19.4%	12
Within 5 years	50.0%	31
Within 10 years	24.2%	15
Greater than 10 years	6.5%	4
Answered question 62		62
	Skipped question	21

#### Question 18: What are the issues or barriers for NOT including ALL permanent records in your transfer plan?

This question asked for free text responses and 54 organisations responded to this. Many of the responses included a variety of issues. The below table sets out how many of the responses these themes were included in.

#### Table 18 Issues and barriers for agencies not including all permanent records in transfer plan

Theme	Response Count
Cost and time constraints	21
Records are still needed for administrative/business purposes	15
Organisation is working towards this but there are things it needs to put in place first (i.e. RDA coverage, system upgrades etc.)	8
Not seen as a priority or don't believe it is really necessary	4
Organisation needs staff with proper knowledge and skills	4
Concerns that the process will take too long or be too hard	4
There are no barriers to this	3
Want to keep the records in the local area	2
Concerns that accessing the records after transfer will be too slow and expensive	2



Question 19: Would you like to be considered a priority for transfer of permanent records to PROV in 2017 and beyond?

#### **Table 19 Priority transfers**

Would you like to be considered a priority for transfer of permanent records to PROV in 2017 and beyond?		
Answer Options Response Percent Response Count		
Yes	21.7%	18
No	47.0%	39
Maybe	31.3%	26
Answered question		83
Skipped question 0		0

### Question 20: Does your organisation make records created before 1985 available to the public for access and research purposes?

#### Table 20 Availability of records created before 1985

Does your organisation make records created before 1985 available to the public for access and research purposes?		
Answer Options	Response Percent	Response Count
Yes	64.2%	52
No	35.8%	29
	Answered question	81
	Skipped question	2

### Question 21: What records created before 1985 does your organisation make available for public access and research purposes?

A wide variety of records were reported including plans, maps, annual reports, case files etc.

### Question 22: Have you undertaken or are you planning to undertake a Digitisation Project for your records created before 1985?

#### **Table 21 Digitisation Projects**

Have you undertaken or are you planning to undertake a 1985?	a Digitisation Project for your reco	rds created before
Answer Options	Response Percent	Response Count
Yes	37.3%	31
No	43.4%	36
Don't know	19.3%	16
	Answered question	83
	Skipped question	0

#### **Question 23: Any further comments**

26 responding agencies included further comments, generally outlining their holdings or their transfer or digitisation plans in more detail.

