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# Ethics of Access in Displaced Archives

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## Introduction

In November 2013, the National Archives and Records Administration (NARA) premiered a traveling exhibit entitled "Discovery and Recovery: Preserving Iraqi Jewish Heritage."[1] The exhibit, which remains in circulation as of September 2015, documents the dramatic recovery and conservation of an extensive archive of historic texts and manuscripts discovered in 2003 by American military forces in Baghdad. Under a memorandum of understanding with the Iraqi government, U.S. officials agreed to return the archive at a future date; however, representatives of the Iraqi Jewish diaspora claim the archive as cultural heritage and property of the Iraqi Jewish community.[2] While custody questions remain unresolved, NARA's decision to digitize and provide public access to the Iraqi Jewish Archive presents a compelling example of an ethical question rarely addressed by archival literature.

Within the United States, literature on displaced archives generally addresses custodial considerations, including the principle of inalienability and arguments for or against repatriation of specific record groups. Though scholars have written at length about access to human rights records in transitioning countries and repatriation of indigenous materials, American archivists have yet to establish a moral or practical consensus on access to displaced archives held by U.S. institutions.[3] Archivists working with displaced archives must navigate a complex web of ethical imperatives, competing moral claims, contradictory legal frameworks, shifting national security norms, and customary practices that reflect centuries of colonization, occupation, and conquest. In the absence of either rigorous professional engagement or a clear ethical framework, institutions managing displaced archives may establish policies that unnecessarily restrict access, violate the values of the creators, privilege certain groups of users over others, or inflict harm upon members of the originating community.

This literature review fundamentally reflects American practice and ethical considerations, but selected articles from Africa, Europe, and Oceania provide comparative examples. Further ethical insights were derived from discussions of indigenous archives in the US and Australia, colonial archives in Africa and Asia, and state archives seized during twentieth century military conflicts.

## Defining Displaced Archives

The term "displaced archives" has emerged as the foremost identifier in American literature, but international scholars may also refer to them as "migrated archives," "expatriate archives," or "seized archives."[4] In her 2010 text on ethics in archives, Elena Danielson defined

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[1] "Preserving the Iraqi Jewish Archives," http://www.ija.archives.gov/exhibit/exhibit.

[2] "Campaign to Save Iraqi Jewish Heritage," http://iraqijewisharchives.org.

[3] Trudy Huskamp Peterson, "Access Matters: Four Documents," presented at the Cold War History Conference, 25 September 1998, http://www.archives.gov/research/foreign-policy/cold-war/conference/peterson.html.

[4] Mandy Banton, "'Lost' and 'Found': the concealment and release of the Foreign and Commonwealth Office 'migrated archives,'" *Comma* 1 (2012): 44; Mandy Banton, "Destroy? 'Migrate'? Conceal? British Strategies for the Disposal of Sensitive Records of Colonial Administrations at Independence," *Journal of Imperial and Commonwealth History*, 40, no. 2 (2012): 322; Joel Wurl, "Documenting Displacement: The Migration of Archival Sources from Post-WWII East European Emigre Groups," *Archival Science*, 5 (2005): 79-80; Nathan Mnjama,

displaced archives as "archival materials that have been lost, seized, requisitioned, confiscated, purchased under duress, or otherwise gone astray."[5] It is generally understood that at least one party feels the materials were removed illicitly.

Displaced archives may be alienated from their rightful owners by various means, ranging from relatively innocuous—a retiring employee taking home company records—to extreme—colonization, occupation, natural disasters, and armed conflict.[6] This article will focus on archival materials that were illicitly or coercively removed, migrated, or displaced without the consent or knowledge of the creating community. Situations beyond the scope of this analysis include government records that were lawfully migrated to another country for safekeeping, materials that an individual creator and owner has willingly deposited outside his or her country of origin, and research materials about but not created by a historically marginalized group. [7]

**Defining Access**

The Society of American Archivists (SAA) *Glossary of Archival and Records Terminology* defines access as "the ability to locate relevant information through the use of catalogs, indexes, finding aids, or other tools" and "the permission to locate and retrieve information for use (consultation or reference) within legally established restrictions of privacy, confidentiality, and security clearance."[8] The International Council on Archives (ICA) defines access as "the availability of records/archives for consultation as a result both of legal authorization and the existence of finding aids."[9] Access is a product of both physical and intellectual availability, reflecting the ability of researchers to find and explore records both in person and online.[10] As descriptive evidence of records' existence, finding aids and inventories are vital elements of access; however, in order for records to be truly accessible, users must also be allowed to use them without excessive restrictions.[11]

**Common Barriers to Access**
*Lack of description*

Principle 2 of the ICA *Principles of Access* states that "institutions holding archives [should] make known the existence of the archives, including the existence of closed materials."[12] In 2001, delegates to the Eastern and Central Africa Regional Branch of the International Council on Archives (ESARBICA) conference in Harare further urged archivists to "take practical steps in ensuring that these [contested] records are identified, listed and if possible proper arrangements for their housing is made."[13] Nonetheless, it is not uncommon for

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"Migrated archives revisited," *ESARBICA Journal* 30 (2011): 15; Michael J. Karabinos, "Displaced Archives, Displaced History: Recovering the Seized Archives of Indonesia," *Journal of the Humanities and Social Sciences of Southeast Asia*, 169, no. 2-3 (2013): 279-281.

[5] Elena Danielson, *The Ethical Archivist* (Chicago: Society of American Archivists, 2010), 248.

[6] Danielson, *The Ethical Archivist*, 254.

[7] Matthew Gordon-Clark, "Paradise lost? Pacific island archives threatened by climate change," *Archival Science* 12 (2012): 51-67.

[8] *Glossary of Archival and Records Terminology,* comp. Richard Pierce Moses (Chicago: Society of American Archivists, 2005), s.v. "access", definitions 1 and 2, http://www2.archivists.org/glossary/terms/a/access.

[9] ICA, *Principles of Access to Archives,* 12.

[10] Danielson, *The Ethical Archivist*, 292.

[11] ICA, *Principles of Access to Archives,* 3.

[12] ICA, *Principles of Access to Archives,* 6, 8.

[13] Mnjama, "Migrated Archives Revisited," 20.

the location of contested records to be unknown, either as a result of institutional policies or as a consequence of bureaucratic oversight. This reality is a driving force behind the Displaced Archives Project, an emerging initiative in the United States to document and describe displaced archives held by American institutions.[14]

National security interests are frequently cited as justification for avoiding disclosure in addition to restricting access.[15] European archives seized during World War II by the Soviet Army were retained in top-secret government facilities for half a century; scholars only learned of the seized archives after former Soviet administrators acknowledged their existence during the *perestroika* era.[16] Another case study comes from the Noriega documents seized by the United States armed forces in 1989. Retained by the U.S. Department of Defense for over 25 years, the existence of these records was not formally acknowledged until 2011.[17]

Similarly, the British Foreign and Commonwealth Office (FCO) repeatedly denied having custody of missing colonial documents from 38 former protectorates for over 50 years, only admitting their existence in 2011 after Kenyan petitioners secured a court order.[18] An internal report by a British Government investigator noted "because the FCO now saw itself as [the missing archives'] custodian rather than their owner, they came to be almost 'off limits'; they were neither listed for FOI purposes nor routinely searched."[19]

After the nominal existence of displaced materials is disclosed, access may remain limited by a lack of intellectual control and documentation. Even when institutions have the best intentions, description of displaced archives (like all collections) may be delayed by limited institutional capacity. Formerly accessible collections may be withdrawn and closed to researchers until the legal status of the records is clearly established; unfortunately, this process may take decades to resolve.[20]

*Distance*

General users may be inconvenienced when displaced archives are stored remotely or in undisclosed locations. However, the removal of archival materials from their country of origin creates a unique hardship for users who regard the materials as their cultural patrimony. Compounded with a lack of transparency, the burden of distance presents a serious impediment for potential Panamanian users of Noriega administration documents and various European communities whose archives were displaced during World War II.

Creators and originating community members may also be excluded from access at the expense of other user groups. In the case of migrated colonial archives in Britain, all but the most sensitive documents were made available at the UK National Archives after 2011; while this policy provides unprecedented access to scholars who can visit the UK National Archives facility in Kew, citizens of Kenya and other former British protectorates remain physically and

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[14] Brett et. al., "Displaced Archives: Current Controversies and a New Initiative," (symposium conducted at the meeting of the Society of American Archives, New Orleans, LA, August 11-18, 2013).

[15] Danielson, *The Ethical Archivist*, 279-280.

[16] Patricia Grimsted, "Displaced Archives and Restitution Problems on the Eastern Front in the Aftermath of the Second World War," *Contemporary European History* 6, no. 1 (March 1997): 54-56, 60.

[17] Douglas Cox, "The Lost Archives of Noriega: Emancipating Panamanian Human Rights Documents in U.S. Military Custody," *Boston University International Law Journal* 32, no.1 (Spring 2014): 58.

[18] Banton, "Destroy? 'Migrate'? Conceal?," 322; Banton, "'Lost' and 'Found,'" 33.

[19] Banton, "'Lost' and 'Found,'" 36.

[20] Danielson, *The Ethical Archivist*, 266-268.

intellectually separated from their history.[21] Various Iraqi archives displaced after the 2003 invasion were made available through American institutions to properly credentialed academics.[22] Iraqi cultural officials protested these practices as cultural imperialism, lamenting that "Iraqis, including the scholars and the victims of the former regime will be given no access to their own documents, while the Americans (the occupiers) will continue to enjoy such a privilege."[23]

*Language*

      Language barriers hinder universal access to information across a range of technologies, particularly in cyberspace.[24] Reflecting upon existing international commitments to human rights, the United Nations Educational, Scientific and Cultural Organization (UNESCO) has long called upon institutions to promote multilingualism in cyberspace and information retrieval technologies.[25] Archives displaced from their country of origin are generally described in the working language of the custodial institution, sometimes requiring significant time and resources to translate; providing parallel description in the native language of the materials is rarely a priority.[26] When finding aids are written in a different language than the materials themselves, members of the originating community are likely to be alienated from their cultural patrimony.[27]

**Conflicting Professional Values: Access versus Privacy**

      SAA codifies access to records as one of its core values, stating that "access may be limited in some instances, [but] archivists seek to promote open access and use when possible."[28] Principle 6 of the ICA *Code of Ethics* similarly states that "archivists should promote the widest possible access to archival materials and provide an impartial service to all users." [29] However, archivists are also called to respect the privacy rights of record creators and third-parties.[30] Canadian legal scholar Doug Surtees argues that professionals should fight the urge to relegate

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[21] Banton, "'Lost' and 'Found,'" 34; The National Archives [United Kingdom], "Colonial administration records (migrated archives) guidance," 2012, http://www.nationalarchives.gov.uk/documents/migrated-archives-4-guidance.pdf.

[22] Bruce Montgomery, "US Seizure, Exploitation, and Restitution of Saddam Hussein's Archive of Atrocity," *Journal of American Studies* 48, no. 2 (2014): 577, 582; Saad Eskander, "Minerva Research Initiative: Searching for the Truth or Denying the Iraqis the Rights to Know the Truth?" *Social Science Research Council,* http://essays.ssrc.org/minerva/2008/10/29/eskander/.

[23] Saad Eskander, "Saad Eskander's open letter to the Hoover Institution," *Library Juice Press*, July 21, 2008, http://libraryjuicepress.com/blog/?p=439.

[24] United Nations Educational, Scientific and Cultural Organization, *Recommendation Concerning the Promotion and Use of Multilingualism and Universal Access to Cyberspace* (Paris: UNESCO, 2003), http://www.unesco.org/new/en/communication-and-information/about-us/how-we-work/strategy-and-programme/promotion-and-use-of-multilingualism-and-universal-access-to-cyberspace/.

[25] UNESCO, *Recommendation,* 2-3.

[26] Montgomery, "US Seizure," 576-577.

[27] Brett, et. al., "Displaced Archives"; Johannes Britz and Peter Lor, "A Moral Reflection on the Digitization of Africa's Documentary Heritage," *IFLA Journal* 30, no. 3 (2004): 216-217.

[28] Society of American Archives, *SAA Core Values Statement and Code of Ethics* (Chicago: Society of American Archivists, 2011): under "Access and Use," http://www2.archivists.org/statements/saa-core-values-statement-and-code-of-ethics.

[29] ICA, *Principles of Access to Archives,* 3.

[30] SAA, *SAA Core Values*, under "Privacy"; ICA, *Principles of Access,* Principle 7, 3.

privacy to the "'B'-side of access-to-information initiatives."[31] Surtees asks archivists and other information management professionals to consider which users are "in a privacy sense, disenfranchised … [without] a voice in determining what information will be developed, recorded, or maintained," an argument which is reflected in Kay Mathiesen's defense of Native American rights to control access to their cultural patrimony.[32]

Legal rights to privacy are particularly difficult to define in the case of displaced archives because access may be informed by multiple legal, political, and cultural contexts.[33] While American archivists rely on personal privacy laws such as the Family Education Rights and Privacy Act (FERPA) and the Health Insurance Portability and Accountability Act (HIPAA), these standards are not universal.[34] Access is further complicated by the presence of sensitive intelligence documents which may be subject to privacy laws specific to the country where archives are displaced, as was the case for German documents seized by the U.S. Army throughout the 1950s.[35] Repositories may choose to incorporate privacy norms held by the community of origin, but they are not legally bound to do so.[36]

The complexity of competing legal claims may leave displaced archives in limbo for years (even decades), but questions of access remain—even withholding all access represents a conscientious decision.[37] Danielson emphasizes that valid legal restrictions may undermine ethical reasons to provide access, especially in situations where the claimant is either incapable or unwilling of facilitating access to the records.[38] One example is the question of providing access to human rights archives for potential victims when such materials are closed to the general public.[39] Conversely, access may be legally sanctioned but ethically dubious. In the case of Ba'ath party records and seized Iraqi archives, Montgomery notes that the United States was free under international law to "expose, display, even destroy the [seized] records as it so deemed" without consulting Iraqi cultural officials and citizens.[40] Similarly, Gerhard Weinberg expressed significant concern about the National Archives and Records Administration's decision to declassify formerly restricted German records in 1995.[41]

Reconciling transboundary legal frameworks does not fully address ethical questions around access, however. Creators, subjects, users, and archivists working with displaced

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[31] Doug Surtees, "Privacy: A Look at the Disenfranchised," in *Better Off Forgetting? Essays on Archives, Public Policy and Collective Memory*, eds., Mona Holmlund and Cheryl Avery, (Toronto: University of Toronto Press, 2010), 60.

[32] Surtees, "Privacy", 63-64. Mathiesen, "A Defense of Native Americans' Rights," 479.

[33] Trudy Huskamp Peterson, "Attitudes and Access in the United States of America," (Paper presented at Access to Archives: The Japanese and American Practices, Tokyo, Japan, May 9-11, 2007): 8, http://www.archivists.org/publications/proceedings/accesstoarchives/11_Trudy_PETERSON.pdf.

[34] Camila Tessler, "Privacy, Restriction, and Access: Legal and Ethical Dilemmas," *SLIS Student Research Journal* 4, no. 1 (2014): 2-4.

[35] Gerhard L. Weinberg, "German Documents in the United States," *Central European History*, 41, no. 4, Imagining Germany from Abroad: The View from Britain and the United States, (2008): 557-558; Danielson, *The Ethical Archivist*, 266.

[36] Danielson, *The Ethical Archivist*, 127-128.

[37] Banton, "'Lost' and 'Found'," 33-36.

[38] Danielson, *The Ethical Archivist*, 257.

[39] ICA, *Principles of Access to Archives,* 10.

[40] Montgomery, "US Seizure, Exploitation, and Restitution," 570.

[41] Weinberg, "German Documents," 558-559.

materials often maintain different ideas about what kinds of information should be privileged.[42] Archival institutions are more willing to accept limited restrictions to access in the name of personal privacy, intellectual property, legal investigations, and national security, but current international norms fail to reflect the interests of creating communities.[43] In his 2014 article on human rights archives in East Timor, Geoffrey Robinson argued that archivists must actively navigate conflicting values and political tensions in the context of human rights archives.[44] Mathiesen, Danielson, and Frank Boles have noted that stakeholders may retain moral rights and concerns that are not explicitly codified by law, although such considerations may prove difficult to incorporate into existing legal frameworks.[45]

An example of this reconciliation process can be seen in ongoing debates around the rights of indigenous communities in the United States. For a variety of reasons, indigenous communities and other marginalized groups may wish to restrict access to cultural patrimony held by outside institutions.[46] This practice is supported by the *Protocols for Native American Archival Materials* (2009) and the *United Nations Declaration on the Rights of Indigenous Peoples (A/RES/61/295)*, but SAA chose not to endorse the *Protocols* out of concerns that it would establish unprecedented third-party privacy rights.[47] Nonetheless, in his final comments in the 2008 Final Report of the Task Force to review the Protocols, Frank Boles encouraged American archivists to pursue broader multicultural consensus and understanding on the implementation of access versus privacy in collections that were illicitly removed from their community of origin.[48]

## Establishing More Inclusive Frameworks for Access

In the last ten years, archival scholars around the world have increasingly proposed and debated new ethical considerations for access. Michelle Caswell and Geoffrey Robinson present compelling arguments for moving away from the principle of inalienability in favor of access and autonomy for survivors of human rights abuses.[49] Other scholars have advocated for the recognition of new moral rights for communities that have been alienated from their history, including O'Neal, Mathiesen, Halilovich, Lor, and Britz.[50] A meta-analytic review of these

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[42] Danielson, *The Ethical Archivist*, 266.

[43] ICA, *Principles of Access to Archives,* 9-10.

[44] Geoffrey Robinson, "Break the rules, save the records: human rights archives and the search for justice in East Timor," *Archival Science* 14 (2014): 340.

[45] Danielson, *The Ethical Archivist*, 257; SAA, *Final Report: Task Force,* 19; Kay Mathiesen, "A Defense of Native Americans' Rights over Their Traditional Cultural Expressions," *The American Archivist* 75 (November 2012): 457.

[46] Mathiesen, "A Defense of Native Americans' Rights," 465-467; Supriyah Singh, Meredith Blake, and Jonathan O'Donnell, "Digitizing Pacific Cultural Collections: The Australian Experience," *International Journal of Cultural Property* 20 (2013): 90-91.

[47] Mathiesen, "A Defense of Native Americans' Rights," 458-460; Michelle Crouch, "Digitization as Repatriation? The National Museum of the American Indian's Fourth Museum Project," *Journal of Information Ethics* 19, no. 1 (Spring 2010): 45-56; Society of American Archivists, *Final Report: Task Force to Review* Protocols for Native American Archival Materials, (Chicago: Society of American Archivists, 2008): 8, http://files.archivists.org/governance/taskforces/0208-NativeAmProtocols-IIIA.pdf

[48] SAA, *Final Report: Task Force,* 137.

[49] Michelle Caswell, "Rethinking Inalienability: Trusting Nongovernmental Archives in Transitional Societies," *The American Archivist* 76, no. 1 (2013): 128-131; Robinson, "Break the rules, save the records," 325-326.

[50] Jennifer O'Neal, "The Right to Know: Decolonizing Native American Archives," *Journal of Western Archive*s 6 no. 1 (2015): 1-19; Mathiesen, "A Defense of Native Americans' Rights," 460-463, 470, 479; Hariz Halilovich, "Reclaiming Erased Lives: Archives, Records and Memories in Post-war Bosnia and the Bosnian Diaspora,"

emerging moral rights and interests would contribute significantly towards achieving consensus on access to displaced archives. Future discussions should build upon lessons learned from allied professions. Anthropologists, for example, have adopted a stewardship-based approach to managing displaced indigenous heritage, while museum professionals in Australia have begun to incorporate extralegal ethical principles that recognize creating communities as "the primary stakeholders in the care and use of their collections."[51]

*Digitization as access: challenges and opportunities*

Where repatriation is not immediately possible, digitization may facilitate broad access to displaced archives.[52] The term "digital repatriation" may be considered disingenuous by claimants pursuing physical restitution of their cultural heritage.[53] It is particularly important to recognize that claimants may consider copies to be inadequate substitutes for physical repatriation*;* accordingly, digitization should not be used as an excuse to avoid the resolution of archival claims.[54] However, repatriation of digital copies may represent a symbolic gesture of restoration, as in the case of the Anfal secret-police records which were formally transferred to representatives of the Iraqi Kurdish government in 2014.[55]

In implementing digitization as a strategy for access to displaced archives, institutions must guard against actual or perceived exploitation and access disparities among various stakeholders.[56] Digitization may perpetuate further harm when limited resources and information infrastructure prevent members of the creating community from virtually accessing the materials.[57] The enhanced discoverability that comes with digitization amplifies the privacy concerns of traditional archives. In response, archivists have partnered with indigenous communities to establish participatory for access in the United States and Australia.[58]

Ensuring long-term access to digitized materials is a significant challenge. In 2014, Halilovich and Montgomery separately lauded two platforms for virtual access to displaced archives from the Bosnia and Iraq, respectively. In the brief window of time since the articles were published, both platforms—the Zepa Online archive and the Conflict Records Research Center (CRRC) at the National Defense University in Washington, D.C. —have ceased to

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*Archival Science* 14 (2014): 235; Peter Lor and Johannes Britz, "An Ethical Perspective on Political-Economic Issues in the Long-Term Preservation of Digital Heritage*," Journal of the American Society for Information Science and Technology,* 63, no. 11 (2012): 2153-2164; Britz and Lor, "A Moral Reflection," 216-223.

[51] Mathiesen, "A Defense of Native Americans' Rights," 464; Singh, Blake, & O'Donnell, "Digitizing Pacific Cultural Collections," 77-107.

[52] Danielson, *The Ethical Archivist*, 258; Singh, Blake, and O'Donnell, "Digitizing Pacific Cultural Collections," 90.

[53] Singh, Blake, & O'Donnell, "Digitizing Pacific Cultural Collections," 90-91.

[54] Mnjama, "Migrated Archives Revisited," 32; Douglas Cox, "'Inalienable' Archives: Korean Royal Archives as French Property Under International Law," *International Journal of Cultural Property* 18, no. 4 (November 2011): 420.

[55] Ferdinand Hennerbichler and Bruce Montgomery, "U.S. Restitution of the Iraq Secret Police Files from Saddam Hussein's Regime Regarding the Kurds in Iraq," *Advances in Anthropology* 5, no. 1 (2015): 36.

[56] Britz and Lor, "A Moral Reflection," 217-219; Lor and Britz, "An Ethical Perspective*,"* 2153-2156, 2159.

[57] Mnjama, "Migrated Archives Revisited," 18-19.

[58] Crouch, "Digitization as Repatriation?"45-56; Kimberly Christen, "Opening Archives: Respectful Repatriation," *The American Archivist* 74, no. 1 (July 2011), 185-210; "Plateau Peoples Web Portal," Mukurtu Content Management System project page, http://www.mukurtu.org/project/plateau-peoples-web-portal/.

exist.[59] Anticipating this possibility, Montgomery warned that closure of the CRRC would result in a grave loss for scholars, to say nothing of the creating community. [60]

**Conclusion**

      The American archival field has struggled to reconcile existing norms of open-access with the privacy concerns and creator interests proposed by archivists and allied professionals in other regions. Sufficient criticism exists for American archivists to question prevailing norms, but additional scholarship is necessary to establish a new consensus on these complex ethical questions. Further analysis should be conducted on proposed moral rights and emerging regulations. American practitioners will particularly benefit from a comparative analysis of practices and ethical principles in other regions.

      As in many aspects of archival practice, the disparate circumstances that precipitate displacement produce unique intersections of moral and ethical imperatives. The ideal course of action for any given case will depend upon the circumstances of displacement, the content of the archives, the capacity of the involved institutions, and the competing wishes of various stakeholder groups. Emerging practices and ethical frameworks suggest that institutions should, at minimum, acknowledge the existence of displaced archives under their care.

> **Samantha Winn** is an archivist, technical writer, and humanitarian whose professional interests include international information policy and ethics, comparative archival theory, design records, and promoting the participation of underrepresented groups in all aspects of archives. As the Collections Archivist for Virginia Tech, Samantha helps document the history of traditionally marginalized groups in Southwest Virginia and manages the collections of the International Archives of Women in Architecture. She received her MLIS with a specialization in archival studies from Drexel University.

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[59] Halilovich, "Reclaiming Erased Lives," 244-245; Montgomery, "US Seizure," 577; Michael R. Gordon, "Archive of Captured Enemy Documents Closes," *New York Times,* June 21, 2015, online edition, http://www.nytimes.com/2015/06/22/world/middleeast/archive-of-captured-terrorist-qaeda-hussein-documents-shuts-down.html?_r=0.

[60] Montgomery, "US Seizure," 577.