Moving toward a comprehensive policy on public information

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“Official archives are enormous sources of information that contain evidence of the activities which have been conducted, and those which were not. They document and verify if a country’s resources are being used in an appropriate manner and provide the evidence to prosecute those who fail to meet their obligations. The previous paragraph will be true so long as the information is organized and available for use. Having a disorganized archive is almost the same as not having an archive at all; although the relevant data is there, finding the information will prove almost impossible. It is in this area where archiving and IT play a crucial role. The former because it provides the basis for documents to be accessible, and the latter because it can help make such access faster, easier and more efficient.” (Villagrán, 2013).

We have presented four surveys that analyze four fundamental aspects for understanding documentary management. We have examined some basic concepts for articulating discussions between the archival discipline and supporters of the right to know: what is the definition of information, what is the definition of a document and what is an archive document. Nazar carried out a valuable historical analysis of the origins of archiving, a presentation of the procedures and reasons for documentary appraisal that should be taken into account by those who value public information. Nazar further examined the legal and practical conditions for archive accessibility, a discussion fundamental for organizing the community that boosts the right to know and the community that is engaged in documentary management. Villagrán contributed to understanding the archival discipline through the analysis of the main elements that should be taken born in mind upon creating an information system, accounting for the inevitable need to consider multiple disciplines that provide for technical, political and organizational issues concerning the use of databases. Ericastilla, on the other hand, analyzed archivists’ training as an activity that should be associated with the prevailing social needs in which such activity will be carried out. Lastly, María Julia Scarensi carried out a survey on legislation regulating archive management and the structure of National Archive Systems in Latin America, and accounted for the recognition of the right to know in the region and coordination of these regulations with prior archiving legislation.

Thus, we have covered various aspects that allowed us to focus on the debate about the archival discipline. Hence, it is time now to capitalize on these discoveries and findings in order to build up a comprehensive policy on public information enabling us to reconcile expertise, challenges and abilities to guarantee effective information management and adequate information availability to the public. This last section is aimed at addressing these issues and objectives.

Traditions
As shown by the papers mentioned above, one of the first things that requires our attention is the existence of a certain rift between the manner in which the concept of public information is perceived and understood by archivists and by information access communities.

A possible explanation for that cognitive dissonance can be found in the traditions on which these communities were built. As described by Nazar (2013), one of the most relevant stages in the development of archive management is that referred to as “archives as authority armories”. In that period, which covers the emergence of Nation-States, archives were perceived as a fundamental method to exercise power: According to Rodríguez de Diego
archives enabled monarchs to exercise power through archive intervention, possession and control. This was defined as the “coercive function of archives”, characterized by ownership (archives were the exclusive property of the monarch), secrecy (archives were impenetrable, almost sacred), and inaccessibility (due to impossibility to access information)” (Nazar, 2013). During these preliminary stages, archive management evolved based on the need for preservation and the relevance of document protection. This fundamental feature of archive management differs from our leit motiv; we promote freedom of information, and our actions have always been driven by the aim to make information public and, on the other hand, by our conception that information preservation and secrecy should be the exception. While the creation of large archives derives from the organization of Nation-States, subject to the goal of accumulating power (monopolistic and absolute), the spate of legislation regulating the right to know results from the emergence of an agenda concerned with accountability, and the limitation of discretionary power and (abuses by) political players.

Irrespective of these differences as to the origin of those communities, two situations (Collier y Collier, 1991) are critical for appraising the information produced by States, which allowed us to progress toward the idea of public information as we understand it today. The first breakdown was marked by an event that is rarely mentioned when referring to the origins of the right to know: the Law of 7 Messidor, Year II, following the French Revolution, whereby citizens were given the right to consult public documents. The second breakdown occurs with the arrival of a classical reference for the information access community: the Sweden Press Law of 1766. However, the most relevant event for document accessibility and archive opening apparently occurred –at least in Latin America— with democratic recovery in the 80s. This novelty forced those who worked with archive documents to coordinate with other sectors –non-archival, so to speak- in order to satisfy the need for examination of the past and to identify the particulars of systematic mass violations of human rights. Hence, archivists and human rights supporters united and worked together, reassigning documentary value to public information and the need to make documents available for consultation.

None of the above happened upon the spate of legislation that regulated the right to know in the region with the arrival of the new millennium. During the decade that elapsed since the enactment of laws on access to information, there have been -until now- no joint efforts by promoters of the right to know and archivists that enable reassessment of the value of information and that contribute to redefining the manner in which documents are managed in order to respond to citizens’ demands for public information.

Concepts

Now, the distance between both communities (ATI and archivists) lies not only in their genealogy, but also in their definition. We will take the definition of information contained in the Model Law on Access to Public Information, drafted within the context of the Organization of American States, as a reference. Information is defined as “any kind of data that are kept or controlled by a public authority”. As explained by Mariana Nazar (Nazar, 2013), we understand that the Model Law is not referring to any type of information, but to public information; therefore, the scope of this definition should extend to data that is not in the possession of public authorities but that has been produced with public funds. Thus, public information consists of any kind of data that is kept or controlled by a public authority, or that is in the

1 Here, we have limited our considerations as regards Latina America, but a document recently drafted in Tunisia by the archival community in the context of a meeting organized by UNESCO shows clearly that the relation between the right to the truth and documentary appraisal must go hand in hand http://www.unesco.org/new/fileadmin/MULTIMEDIA/HQ/CI/Ci/pdf/news/droit_savoir_tunisie_recommendations.pdf
hands of third parties, provided however, its preparation has been financed through public funding.

At this point, we face the first discrepancy since the archival discipline worked out a different definition of information. That discrepancy is rooted in the work that both communities carry out. For the archive community, “…information may lack supporting means: a conference while it is being lectured, a meeting while it is being held, an order that is given orally. All these activities give rise to information that transforms into documents when a record of those activities is kept: for instance, when a conference is recorded in a supporting means (digital, tape, or otherwise), when a meeting is registered in minutes, or when an order is given in writing, etc. If the information is not recorded in supporting means, it cannot be recovered” (Nazar, 2013). This first distinction among information, document and data is fundamental to engaging in fruitful debate between both worlds.

The second confusion generally arises with the use of the word archive. Undoubtedly, this term is polysemous and has different meanings, even within the archival discipline. As reminded by Nazar, the International Council of Archives (ICA) explains the three possible references for this word:

“1) The set of documents, irrespective of their date, form or physical support, produced or received by any legal entity or individual, through any private or public entity or service in the exercise of their activity, preserved by their creator or successors for their own needs, or transferred to the competent archive institution, depending on their archival value.
2) The institution responsible for gathering, handling, classifying, preserving and communicating archives, also referred to as archive service or Archive.
3) The building or part of the building where files are preserved and communicated, also referred to as archive repository” (Nazar, 2013).

We should not confuse archive and document; a mistake that is very frequently detected among supporters of the right to know and many officers in charge of implementing the laws of access to information.

A second contribution made by the analysis of Mariana Nazar is the selection of public information we usually mention and use while working on the promotion and recognition of the right to know. While our ultimate aim has always been to promote greater transparency in the management of public affairs, most of the time we restrict what we understand public information to mean to what archiving considers “archive documents”, setting aside other types of documents, such as bibliographical and museological documents. Archive documents –understood as those that witness an activity in the administration of an organization (Nazar, 2013)- are those that are most connected with our intention to monitor governance and to identify the acts of those who represent us. This distinction seems to blaze a trail between the work of both communities. While archivists are mainly engaged in evaluating the value of archive documents to determine their historical and heritage relevance, (daily) documentary management of archive documents is in the hands of officers who generally lack archival training and, consequently, do not have any technical skills to identify documentary series, establish describing items for document data and to establish criteria allowing them to distinguish the type of data contained therein. The latter considerations are fundamental for document classification and withholding; this field depends on the joint efforts of both communities.

Policies

Regulatory organization
An issue that is evident from the four surveys is the need to rely on public policies that perceive information as a comprehensive concept. One method of addressing public policies consists of considering the existing regulatory framework. As such, we decided to restrict our approach to that which happens in Latin America; therefore, we will only survey the regulatory developments of the region regarding archives and access to information. This survey allowed us to identify types of regulatory frameworks regarding archives: the first group of regulation governs the creation and responsibilities of National Archives or General National Archives; the second group of legislation has a specific nature; and the third, more thorough, group consists of a set of laws that implements the National Archive Systems, understood as “…the organic set of archives associated to a central board, whose mission is to standardize or regulate archival processes, as a point where information can be brought together and made accessible for consultation” (Scarensi, 2013). Note that even though such regulatory survey was carried out based on a given preference for the creation of National Archive Systems, the debate as to its need within the archival community is not entirely over. Some consider that comprehensive policies on the subject could be adopted, despite the lack of theses systems. We also explained the level of recognition of the right to know and the manner in which both regulations combine.

Thanks to these criteria, we identified an initial group of countries that have National Archive Systems and laws on Access to Information. This group includes Mexico, Peru, Brazil, Uruguay, Ecuador and the Dominican Republic. The second group, comprised of Costa Rica only, has a National Archive System but lacks any specific regulations on the right to know. Another group of countries made progress on the recognition of the right of access to information and has enacted laws to establish general or national archives, but thus far has not regulated the creation of National Archive Systems. This group includes Chile, Panama, Guatemala, Nicaragua and El Salvador. Lastly, there is a group of countries that has made no progress at all in the passing of national laws to regulate the right to know and that has not established National Archive Systems, including Argentina, Paraguay, Venezuela and Bolivia.

Two of these groups catch our attention: Mexico and Uruguay. We will first analyze the Uruguay case. The Eastern Republic of Uruguay is a unique case within the region—and I dare say in the world—where laws regulating access to information and the creation of a national archive system were promoted, discussed, analyzed and approved. This is probably the result of the special structure of the alliance that promoted the regulations, the Archive and Public Information Access Group (Grupo Archivos y Acceso a la Información Pública - GAIP), formed by the organizations APU, SERPAJ, AMARC, Transparencia Uruguay, IELSUR, Udelar Bibliotecology School (Escuela de Bibliotecología de la Udelar), Uruguay Archivists Association (Asociación Uruguaya de Archivólogos), Archivists without Frontiers (Archiveros sin Fronteras) and Amnesty International, Uruguay chapter. The participation of archivists in the coalition can probably explain the joint approach of both legislations that ended up in the enactment of Law No. 18220, whereby the national archive system was established in December 2007, and the enactment of Law No. 18381 on access to public information, passed in October 2008.²

The Mexican case is identified as the only one, among the most recent, where regulation on archives was passed; therefore, it is the only case where efforts were made to coordinate its content with that of the law on transparency and access to information. The law, enacted in 2012, includes among its aims: “guaranteeing timely access to the information contained in archives and accountability, through adequate administration and custody of archives

² Note that a few months prior to the enactment of the law on access to information, the national law on personal data protection had been passed, and became an essential element for information management.
containing governmental public information”. While the regulatory survey is aimed at analyzing intertextuality in preexisting regulations on archives, here we find that new archive legislation takes the law on transparency and access to information as a necessary reference.

The discussion of these cases undoubtedly fails to consider the assessment of the impact of these reforms or the level of progress made in the implementation of regulations. The assessment of the impact of reforms made in the last decade regarding access to information is a pending issue, a task imposed on those who promote access to information and those who study such reforms. Certainly, this should be a key part of future agendas within the access to information community.

**Standards**

Similar to the way in which supporters of the right to know have made an effort in the last decade to set standards to guide legislative debate and to draft policies on access to information; the archival community—in some cases together with other participants—has defined its own standards to direct documentary management. However, few efforts were made to coordinate both standards. One document appears as a reference that cannot be disregarded: “Principles on Access to Archives”, drafted by the International Archive Council in 2011. These principles account for the importance of having policies on access, the need to agree on restrictions on access to information upon transfer, and highlighting the importance of controlling physical access to restricted documents, among other topics. However, the attempt to combine efforts seems to disregard the importance of harmonizing the archival discipline with the exercise of such fundamental rights as the right to know.

**Classification, secrecy and elimination of documents**

A key issue for the organization of documentary management and the right to know is analyzing, describing and promoting mechanisms to identify within documentary series the aspects of documents that should be kept secret or strictly confidential. As explained by Villagrán, we should ask ourselves several questions when creating a database. For instance, if the documents we will organize include data that has to be preserved (for national security reasons, for example) or whether these documents include personal data requiring some special management. The key issue is: In order to meet the requirements set forth by the laws on access to information regarding exceptions, it is necessary to identify the information to be preserved beforehand. That is to say, it is necessary to preserve and limit discrentional action by the officer who decides whether a document should be classified as secret when a request for information is received.

These “stitches” between the two worlds essentially help to comply with the provisions of the laws on access to information and the instruments adopted in the context of international efforts, an example of which are the Principles on National Security and Access to Information

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4 UNE-ISO 30300:2011, on document management systems; ISO 15489 on information and documentation – document management; ISO 23081 Metadata for document management. Theoretical and implementation aspects; ISO 15801:2004 –Electronic Image– Information stored electronically; and the ISAD(G) -General International Standard Archival Description-.
drafted by Open Society Institute. Upon analyzing chapter VII of this document regarding the rules for classification and de-classification, and management of requests for information, we will see that it is very complicated for these protocols to be followed, unless there is a comprehensive policy on archives that brings together the legal accessibility aspects set forth in the laws on access to information, and unless officers are duly trained to catalogue documents.

Another issue that is of the utmost importance for organizing information officers and archivists is the consideration of the exceptions set forth in regulations on access to information —or other regulations associated with data management, such as the law on intelligence, national security or personal data protection— when building databases or identifying documentary series. As explained by Villagrán, “When planning to build an information system, we should be able to answer and have clear responses for the following basic questions: What is the information for? An infrastructure will be set up to create the system, but for what or for whom will the information be useful? How is this information needed? Will it be broadcast through electronic means such as Internet? Will there be individual deliveries? Will it be delivered in printed form? Can it be delivered in digital format? Will it be used for legitimate purposes? According to the resources and capabilities you have, within which term will the data be made available to users? How many IT resources will be needed to preserve the information? Are there financial resources to keep the computer up to date?” (Villagrán, 2013).

Nazar differentiates between two types of documentary accessibility: one of practical nature —whose conditions will be described below— and another one of legal nature. Experience seems to show that the archival community specializes in the first one, while information officers or legal departments at public entities focus on the second one. Hence, a fundamental recommendation is to successfully coordinate the work of both areas in order to harmonize both accessibilities and to guarantee access to information, and protection and secrecy of documentation that cannot be delivered. In that regard, Nazar states: “In summary, for the purposes of analysis, the conditions of accessibility to documentation can be divided into those of practical and those of legal nature. That notwithstanding, to achieve an effective solution, it is necessary to address them as a whole, based on a documentary management policy. Such policy should include the elements mentioned above and, in particular, the performance of archival tasks for identification, classification, description and appraisal of documentary series in order to hold (and allow public access) identification of functions, administrative procedure and (specifically) the type of proceeding —series— and documentary types contained. (...) In summary, the importance of effective documentary management —planned before the creation of each document and until its ultimate disposition— lies in that it enables identification of documentary series and that it facilitates: a. Knowing in advance to their creation the documentary series that will be classified or that will contain sensible data (...) b. Drafting descriptions that can be used throughout the life cycle and that are accessible through the web to promote proactive transparency; these descriptions must also include the series for which access has been temporarily exempted”.

Thus, the recently enacted rule in Mexico is significantly relevant: The law sets forth that “information classified as confidential based on the Federal Law on Transparency and Access to Governmental Public Information, whose permanent preservation has been decided due to its historical value, shall retain such classification for a period of 30 years as from the date of creation of the document containing such information, or otherwise 70 years in the case of personal data affecting the owner’s privacy or whose undue use may give rise to discrimination or entails a serious risk for the latter. These documents will be identified as confidential
historical documents. Confidential historical documents shall remain in the concentration archive of the individuals who are bound by the term set forth above. After expiration of such term, those documents shall be transferred to the National General Archive or the appropriate historical archive, and cannot be classified under the terms of the Federal Law on Transparency and Access to Government Public Information.” This section –among others—serves to inform and educate archivists regarding the criteria that should be taken into account upon classifying information.\(^5\) Discussion is still open as to the adequacy of those terms.

Another important aspect for the organization of both worlds is the consideration of the life cycle of documents. As described by Nazar (2013), archive documents evidence three moments or periods: “The first period runs from the moment the document is planned, drafted and until the function/purpose for which it was created is achieved; documents remain active while the proceeding that originated them has not concluded. During a second period, when the proceedings have finished but documents remain in force, they are preserved to respond to potential legal or administrative claims or to serve as direct precedent for a document; i.e. they are kept for precautionary purposes. Upon conclusion of this period, documents may be set aside (eliminated) or may start their third period; i.e. a stage undergone by documents where, upon documentary evaluation, they are appraised as permanent or historical”.

This division into stages is essential to limit discretionary power during the elimination of documents, an issue that has been rarely included the laws on access to information. The archival community has defined precise criteria for the elimination of documentation that allows for the evaluation (and documentation) of the administrative or secondary value of a document (included in a documentary series). However, while these criteria are ignored by the information access community, they constitute an essential element for uniform organization of documents within a country. The Model Law identified the need to focus on the elimination of documents but failed to provide further instructions as to how to do it: “The Information Officer will have the following duties, in addition to the obligations specifically set forth in other sections of this law: a) promoting best practices, among public authorities, regarding document maintenance, archive and elimination”.

Pursuant to the specifications of the Model Law, Section 32 provides that: “The [authority in charge of archives] should prepare, in coordination with the Information Commission, as system for maintaining documents that will be binding on the entire group of public authorities”. Again, this general consideration does not include more accurate information as to how that task should be performed or what aspects should be taken into account to guarantee the right to know. The documents included in this publication contain some specific recommendations for the preparation of a comprehensive policy on the field.

The elimination of archives has been a largely discussed topic within the archiving community during the last few years. As explained upon distinguishing the periods of a document, the third period is achieved when a document has transcended its administrative purpose and acquires historical value. The problem lies in the assessment of that value. Some regulations, such as the Argentine law on personal data, skip that step and provide that after a given period of time, all documentation containing personal data can be eliminated. Hence, Section 4 of that law provides: “data should be destroyed once they are no longer necessary or suitable for the purposes for which they were gathered”.

\(^5\) Another good example of coordination between the two rules is the imposing of penalties upon those who prevent or hinder consultation of historical archives without fair cause.
A similar debate is currently being held in relation to legislation regulating the right to oblivion—right to be forgotten-. The French Association of Archivists has recently issued a press release⁶ in view of the project discussed at the European Parliament regarding the right of the owner of personal data to erase, block or eliminate personal information that is considered obsolete due to the lapse of time, or that in some other way affects the free exercise of any of his or her fundamental rights.⁷ The position of archivists is that the automatic elimination of documents prevents expert evaluation of the historical value of those documents.

Archives and information officers: micro-policies

Furthermore, Nazar (2013) makes specific recommendations for a successful coordination among officers in charge of archive management and information officers. These recommendations include adopting measures to guarantee practical accessibility to documents:

- Material document preservation
- Availability of archive repositories, services and equipment
- Organization and respect for documentary collections
- Allocation of staff and economic means
- Preparation of auxiliary and descriptive instruments
- Dissemination
- Possibility to perform reprographies to avoid excessive manipulation of originals
- Availability of adequate machinery for digitalized or audiovisual document reading

Another recommendation made by Nazar (2013) emphasizes the need to have “… [p]roper archival planning calls for state policies on archiving that consider the necessary technical abilities for planning, drafting rules that are not restricted to the short term and creating effective mechanisms to control compliance. In that sense, the implementation of integrated and interoperating documentary systems within state institutions is a priority issue, together with budget and political appraisal of National Archives and/or Archive Councils, which must be capable of projecting rules that are consistent with those with which they are in conflict, and articulating regional rules to allow detection of lack of guarantees for exercising the right to access public documents through administrative procedures and remedies for prompt processing and resolution”.

Along those same lines, Nazar abrogates for the design of documentary management programs that provide functions, procedures and mechanisms for information management. In that regard, Nazar states: “Identifying, describing and appraising the documentary series produced by the administration allows to facilitate the tasks of documentary access and dissemination, classification of security, protection of sensitive and personal data and –mainly– the definition of terms for publicity and elimination or transfer of documentation, the allocation of areas in charge of safeguarding and enabling access to them, transfers, etc”.

Another aspect on which the enquired researchers agreed is the need to have budgetary items that allow for funding the aforementioned policies: “… To achieve efficacy, it is necessary to guarantee from an economic and structural perspective the existence of central archives in the various administrations to operate effectively, which in turn would help avoid attempts to outsource the service” (Nazar 2013: xx). In this regard, note the recommendation made by Villagrán: the best application for archive management and access will be that which is more in keeping with the environment and resources.

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⁶ http://www.archivistes.org/Au-nom-du-droit-a-l-oubli-quel
As supporters of the right to know, we have largely discussed the importance of relying on information officers who are capable of listening to citizens, translating their demands for information into specific requests and guiding them in the search for documents. We have written and spoken a lot about the importance of thinking about the distance between the questions a citizen wishes to ask and the manner in which public information is organized and systematized by an administration. In examining this issue, the requirement to guarantee the conditions for effective accessibility to archives should also be considered.

We will now review the case explained by Villagrán in his article: “A NGO researcher has recently requested an entity from the Guatemalan government, under the provisions of the Law on Free Access to Information, a list of beneficiaries of a social program to assess the impact by geographical region and age group. The list, including more than 700,000 names, was delivered in a pdf file with all possible protections; even the possibility to copy the text in the file was blocked. The archivist fulfilled his obligation to deliver the information under his custody; however, delivering the file in such a format was almost as not delivering the information at all. The file was not functional, and the data in it could not to be analyzed” (Villagrán, 2013, xx).

As explained by the author, archival organization and document digitalization simplifies access to documents. If we consider that the laws on access to information require that an answer be received within 10-20 days —a few more days, if we consider possible extensions-, archivists should have tools to allow solving requests in a prompt manner, without having requests for information hindering the development of all other daily activities. Documentary management should consider accessibility, not only by historians or researchers, but also by ordinary citizens who wish to know how public funds are used. As mentioned by Villagrán, metadata and databases may help simplify this problem.

Nazar (2013) adds a specific recommendation to implement such coordination between the right to know and documentary management: “If the minimum conditions for accessibility to Archives are guaranteed, the creation of an area to cooperate with access to information engaged in translating, directing and guiding citizens regarding their requests for access —as well as carrying out follow-ups and research- is an excellent way to guarantee reactive transparency. This area can be organized as an information, documentation or research center, depending on its functions” (Nazar, 2013: xx).

Ericastilla adds: “Referential work involves guiding the user and providing the necessary help in the search for information. This is achieved through printed catalogues, many of which are also available in the computers located at the Reference Rooms specially prepared to that end. The areas to be used for accessing information should not be perceived as mere windows where paper forms are delivered, but as highly specialized advisory areas where citizen’s requests are addressed. In the case of countries that have suffered due to severe internal conflicts, there should also be a space for psycho-social support to victims or their relatives, to avoid their feeling intimidated upon coming closer to the same Government areas that probably acted against them” (Ericastilla, 2013: xx).

**Training**

A fundamental measure to adopt a comprehensive policy on public information consists of developing training for public officers to promote adequate documentary management and appraisal of public information.
To that effect, we should consider two types of training: the training of a professional archivist and the training of public servants and officers who carry out their duties on a daily basis with the available raw material, or information.

Ericastilla’s analysis accounts for the importance of leading professional archivist training beyond formal training and also including ongoing and constant training to guarantee the implementation of the best archiving practices.

The experience survey performed by Ericastilla acknowledged an important vacant area: formal training programs for archivists lack references to the importance of the right to know and its regulatory recognition. This explains the existing cognitive dissociation, but it also paves the way for potential cooperation. As evidenced by the Guatemalan case, generating special training on human rights enabled the development of specific archiving tools, consideration of new users of documents and the possibility of thinking of new ways to manage information so as to satisfy “non-archival” purposes. The Guatemalan experience demonstrates that it is possible to adapt it to understand citizens’ demands for public information.

Open data and transparency portals
Our final consideration regarding policies will address open data and transparency portals. As we all know, many regulations have provided for the creation of transparency portals and have defined a series of issues to be proactively covered by the administration regarding disclosure of information. In his analysis, Villagrán stated that “...This type of data, despite being public documents containing interesting information such as employees’ payroll and salaries, or the institutional budget, in fact, do not make up an archive. They are just a group of documents in digital format which are made available online for consultation. In order to be an online archive, for example, all the folders of the accountancy archive would need to be available for online access” (Villagrán, 2013: xx).

We understand that this is the aim of the so-called revolution of open data. Now, can we follow this agenda without considering the manner in which documents are organized within public administration? Can we promote this agenda irrespective of the generation of a comprehensive policy on archives, the respect for archiving standards? The agendas on access to information and archives have taken separate roads up until this point; hence, today we face a new challenge: bringing together the open data agenda with the road arduously traveled by archivists.

Is this revolution possible? Villagrán states that “...Nowadays, almost all the information produced by the government is created in a computer, thus, to publish it online could be pretty simple”. The challenge lies, precisely, in whether we set aside the demands and claims of the archival community: “...there are no systems, standards or infrastructure to do this. All documents would need to be created in the same format, with a certain nomenclature standard, and central servers would be needed to hold the information” (Villagrán, 2013: xx).

No access without archives
It is as simple as the heading reflects. Do we aim to have organizations respond to requests for information in an effective and complete manner, and within the terms set forth by the laws on access to information? Do we aim to have information secrecy adjust to the law and comply with international standards and principles? Do we aim to guarantee the confidentiality of sensitive personal data? Do we aim to limit discretionary power in the decision-making process regarding disclosure and/or secrecy of information? Do we aim to progress on the open data agenda?
If we want to progress on the agenda for recognition and effective exercise of the right to know, we should establish links with those who preceded us in the appraisal of information, those who gave the first steps to highlight the value of documentary records. If we want to move forward, we need to take a step back and build new bridges. We need to learn from our archivist colleagues to become stronger.

Pursuant to the epistemic community concept of Haas (1992), it is essential to expand the network of professionals with renowned skills and expertise in the right to know in order to reach and incorporate archivists. To that effect, it is necessary to:

a) Have “a shared set of normative and principled beliefs which provide a value-based rationale for the social action of community members”. This calls for work on disagreement as to the concept of public information, the cognitive dissonance regarding this term. This should be the initial step of a future work agenda.

b) Have “shared causal beliefs which are derived from their analysis of practices leading or contributing to a central set of problems in their domain, and which then serve as the basis for elucidating the multiple linkages between possible policy actions and desired outcomes”. The gap between the two communities appears, as we have described in this document, in the harmonization of the traditions of both communities and the tension between disclosure and preservation of information.

c) Develop “shared notions of validity, i.e. intersubjective, internally defined criteria for weighing and validating knowledge in the domain of their expertise”.

4. Build “a common policy enterprise, or a set of common practices associated with a set of problems to which their professional competence is directed, presumably out of the conviction that human welfare will be enhanced as a consequence”.

As shown in the surveys we have presented, we need a comprehensive policy on public information that takes into account the entire archiving process and that adapts it to the legal accessibility conditions established in the regulations on access to information.