



The Openness of State Archives in the Former Soviet Republics and Eastern Bloc Countries - the Outcomes of the Evaluation

2019

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Abstract

In 2017, the Institute for Development of Freedom of Information (IDFI), together with the international network of archive experts, started carrying out the project “Enhancing Openness of State Archives in the Former Soviet Republics”.

The project aimed at assessing the archives of former Soviet and Eastern Bloc countries to enable interested persons to understand the level of openness of particular archives and the accessibility of relevant documents. The openness of regime archives, preserving the documents that can become a basis for the identification and rehabilitation of victims of repression, was of paramount importance.

Within the frame of the 2017-2018 project, a methodology for evaluating the openness of state archives was created and 20 state archives in 10 post-Soviet countries were evaluated. The project continued during the next years (2019-2020) and 8 new countries from eastern and central Europe were added to the rating. As a result of the project, 2 archives were evaluated in each country.

Keywords: *State archives, archives of former secret services, post-communist countries, repressions, right to know the truth, victims, archival science, archival law, freedom of information.*

Introduction

Why the openness of archives in the former Soviet and Eastern Bloc countries is important?

The openness of archives is very important for studying history in different countries. However, this issue is more critical in the countries where archives can be used for the identification and rehabilitation of the victims of repressions. In the region covered by IDFI’s project, the archives and especially “Regime Archives”¹ play an important role in this direction.

Access to the Soviet archives and archival documents remains a contentious topic among many post-Soviet countries. The transition to democracy, de-Sovietisation and rethinking of the Soviet past proceeded at a different pace and took various paths in the former Soviet republics. During the 70

¹ “Regime Archives” keep documents of the state institutions which implemented the repressive actions.

years of the Soviet rule, history was used as an ideological weapon devoid of any real facts; history was full of falsifications, misinterpretations, communist postulates and clichés. The only space where communists were truthful and honest was with “Secret” and “Top Secret” documents that Soviet bureaucrats circulated among the highest level of government echelons and ruling elite and this documents nowadays are kept at various archives. Therefore, without archival work, no genuine and accurate scientific and historical research is possible related to the Soviet era.²

Human rights were seriously infringed during the communist regime which was in effect in many European states for a large part of the twentieth century. Nowadays, this regime is responsible for widespread and systemic repressions against millions of people, which resulted in serious human rights violations. After the collapse of the communist regime in the 1990s, many post-communist countries faced and are still facing the problem of how to deal with the past and, if needed, how to establish individual or collective responsibility and rehabilitate victims in compliance with the law. In this regard, the countries chose different paths.³

According to the resolution by the Council of Europe, individual and collective assassinations and executions, death in concentration camps, starvation, deportations, torture, slave labor and other forms of mass physical terror, persecution on ethnic or religious grounds, violation of freedom of conscience, thought and expression, of freedom of the press, were among the crimes committed by the totalitarian communist regimes.⁴

One of the most important works on the crimes committed under the communist regime is *The Black Book of Communism* by Stéphane Courtois and others (1999). More similar works include *Bloodlands: Europe between Hitler and Stalin* by Timothy Snyder (2010); *The Great Terror: A Reassessment* by Robert Conquest (1990); *Origins of the Great Purges* by J. Arch Getty (1985); *The Red Army and the Great Terror: Stalin's Purge of the Soviet Military* by Peter Whitewood (2015), etc.

The prevalent opinion in academic literature is that archives should be opened and the truth should be disclosed concerning the past repressive regimes in the defense of human rights. The establishment and preservation of archives are in the interest of the state and it is in the position to control access to various documents. However, a conflict between the right to access and right to privacy is inevitable which must also be balanced with a public interest in reconstructing a democratic state.⁵

² Anton Vatcharadze, Regime Archives, Memory of Nations: Democratic Transition Guide – the Georgian Experience, “CEVRO”, Prague, 2020.

³ Gruodytė E., Gervienė S., Access to Archives in Post-Communist Countries: The Victim’s Perspective, Baltic Journal of European Studies, Tallinn University of Technology, Vol. 5, No. 2 (19), 2015, pp.148.

⁴ Resolution No. 1481 on need for international condemnation of crimes of totalitarian communist regimes, Parliamentary Assembly, Council of Europe. 2006.

⁵ Gruodytė E., Gervienė S ... 2015, pp.155.

Research Methodology

IDFI and its partners evaluated state archives of 18 post-Soviet and former Eastern Bloc countries: Armenia, Azerbaijan, Belarus, Bulgaria, Czech Republic, Georgia, Hungary, Kazakhstan, Kyrgyzstan, Latvia, Lithuania, Moldova, Poland, Romania, Russia, Tajikistan, Ukraine and Uzbekistan.

The evaluation methodology, developed jointly by IDFI and its partners, covers key legal and practical aspects of archival openness. The methodology consists of 5 components:

- Archival legislation – the extent to which archival legislation ensures openness of state archives;
- Other legislation related to archives – the extent to which related legislation ensures openness of state archives;
- Archival services – the extent to which archival services are available and developed;
- Archive website – the extent to which the archive website is useful for researchers;
- Reading hall – the extent to which reading hall regulations and practice are developed.

The methodology was elaborated at the first stage by the partners, researchers of archives and activists who advocate the openness of archives. Also, the representatives of academic circles of archival studies were involved in the research. They were actively involved in the development of recommendations and methodology. The people included in this process were:

- Malcolm Byrne - Deputy Director, Research Director of the National Security Archive at George Washington University, USA;
- James Lowry - University of Liverpool; Leading Open Government Partnership National Action Plan on records management of the UK government's commitment;
- Thomas Welsford - All Souls College, Oxford, UK;
- Joachim Foerster - The Federal Commissioner for the Documents of the State Security Service of the Former German Democratic Republic, Germany;
- Andriy Kohut - Director of the SBU (former KGB) archives of Ukraine;
- Ingūna Slaidiņa - Deputy Director, National Archives of Latvia;
- Timothy Blauvelt - Historian of Soviet Studies, Professor at Ilia State University, Georgia.

Also, all of the project partners from the countries evaluated in 2018 and 2019.⁶

⁶ See the list of partners: http://open-archives.org/en/pages/about/about_platform

The general standards and approaches related to archival work established by the International Council of Archives (ICA) were considered during the elaboration of methodology.⁷

IDFI's standard has become the first such document. One of the goals of the project was to establish a methodology and standard of archival openness worldwide.

Two archives evaluated in each country were chosen according to the following principle: the main archive of the country (e.g., national, historical or other similar archives), and the archive of former repressive state bodies, such as the former KGB (e.g. regime archive).

During the research, the above-mentioned approach could not be implemented in all of the countries due to objective or subjective reasons. Our researchers were denied access to the regime archives in Azerbaijan and Uzbekistan. For this reason, the former repressive state body archives in these two countries received 0% evaluation in the components of archival services, website and reading hall.

Also, in several countries, it became impossible to evaluate the regime archives because of the similar specifications and conjuncture do not exist in the countries any more. This concerned the following countries:

- Tajikistan, where the Central State Archive of the Republic of Tajikistan and the Film-Photo-Audio Archive of the Republic of Tajikistan were evaluated. The reason for this was that the Archive of KGB of the Tajikistan SSR was destroyed during the first days of the Tajik civil war, in May 1992, even though some journalists and civil activists claim, that only a part of archives was destroyed during the civil war and the Government does not allow the publication of the remaining collection.⁸
- In Latvia, regime and ordinary documents are united into one archive and the procedures for accessing them are identical. On 3 March 2010, the President of the Republic of Latvia proclaimed the new archives law. According to this law, since January 1, 2011, former State archival system of Latvia has been reorganized within one body - the National Archives of Latvia. The National Archives of Latvia is a legal successor of the obligations and property of the former institutions of the State archival system. Therefore, in Latvia, only the National Archives was evaluated and it resulted was considered as a result of the whole country.
- Also, Moldova can be considered as an exception to some extent. Its second archive - The Archive of Social Political Organizations of the Republic of Moldova (AOSPRM) preserves the documents of Soviet era, however, they contain not specifically the

⁷ <https://www.ica.org/en/public-resources/standards>

⁸ The Unpublished Memoirs of General Saidmair Zuhurov, former KGB Chairman, "Противостояние" (Confrontation).

documents of security organs but the party materials of the social and political organizations.

You can find the sources and evaluations used during the research on the portal of archives <http://open-archives.org/en/data>. In this document, all points and answers are cited.

Our partners, who have studied the openness of archives on legislative as well as practical basis, are responsible for the accuracy of the research carried out in each country.

Key Findings

- The legislature of the first 7 countries out of 9 are synchronized with the legislature of the European Union. The legislature of Moldova and Ukraine are autonomous;
- Open and some of the closed archives have a common approach to the classified documents: they do not destroy formerly classified fonds, files, or records – the documents that at some point were made secret by the state. At the open archives, the extension of secrecy period is not allowed. After the set date, such documents become publicly available. The documents that had been secret can not be re-classified;
- The laws on the protection of personal data do not extend to archives or fonds of repressive state institutions, documents of regime archives. This is a principle of the countries with examples of the best archival openness, including Latvia and Ukraine. Also, Kazakhstan shares this principle on a legislative basis;
- The archives that are among the most open countries offer the best online services to researchers and vice versa – archives with less openness have worse results in this direction while some of them do not have online recourses at all;
- The archives oriented st researchers enable the researchers to use electronic versions of documents online. Also, photocopying in reading halls is allowed at 5 out of 6 archives with the highest score of the openness: Czech Republic, Poland, Latvia, Lithuania, Ukraine.

Analysis of the Evaluation Results

Basic Results

According to overall results, Lithuania (86.81%) has the most open and accessible archives among the evaluated 18 former Soviet and Eastern Bloc countries, followed by Latvia (83.23%), Bulgaria (81.25%), Ukraine (80.8%). These archives took place in the “Green Area” which includes the archives with 80%+ openness. Also, the results of the Czech Republic (79.29%) and Poland (78.43%) were quite close to the “Green Area”. Hungary (74.46%) took seventh place and Georgia (70.99%), Romania (70.83%) and Moldova (69.90%) 8th, 9th and 10th places respectively.

Countries with the least open archives are Belarus (42.17%), Kyrgyzstan (41.21%) and Uzbekistan (31.87%) (see Figure #1). Security service archives of these countries are completely closed.

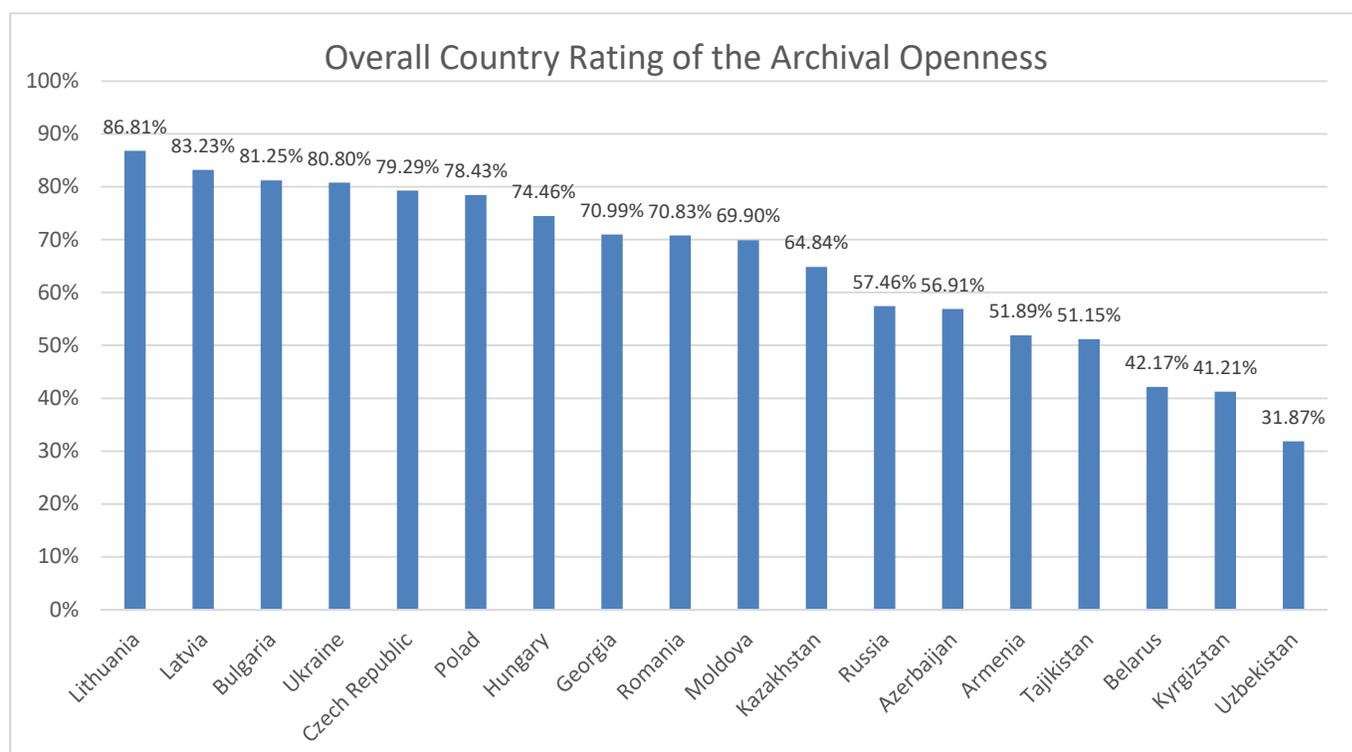


Figure 1: Openness of state archives according to the countries.

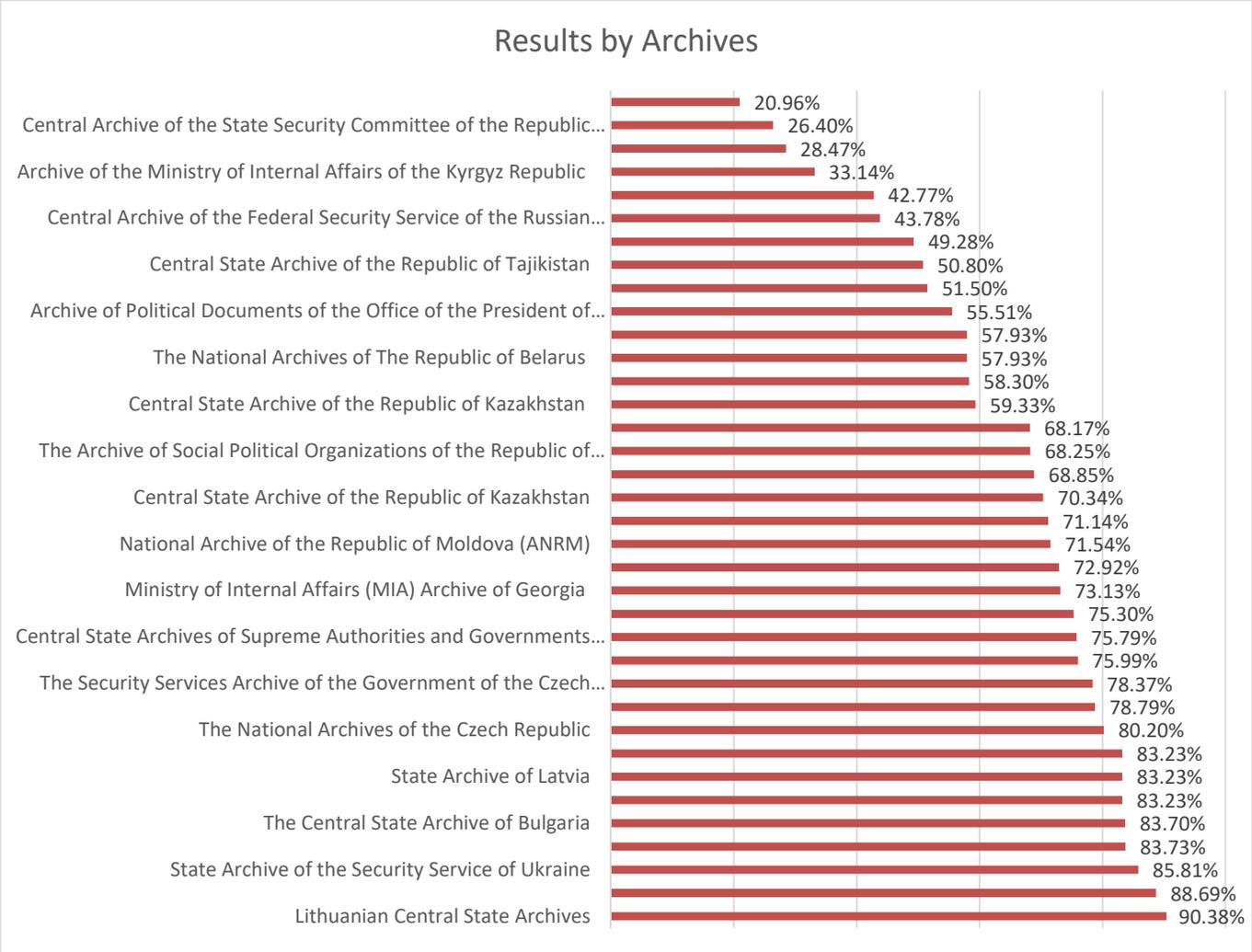


Fig. 2: Total results by archives

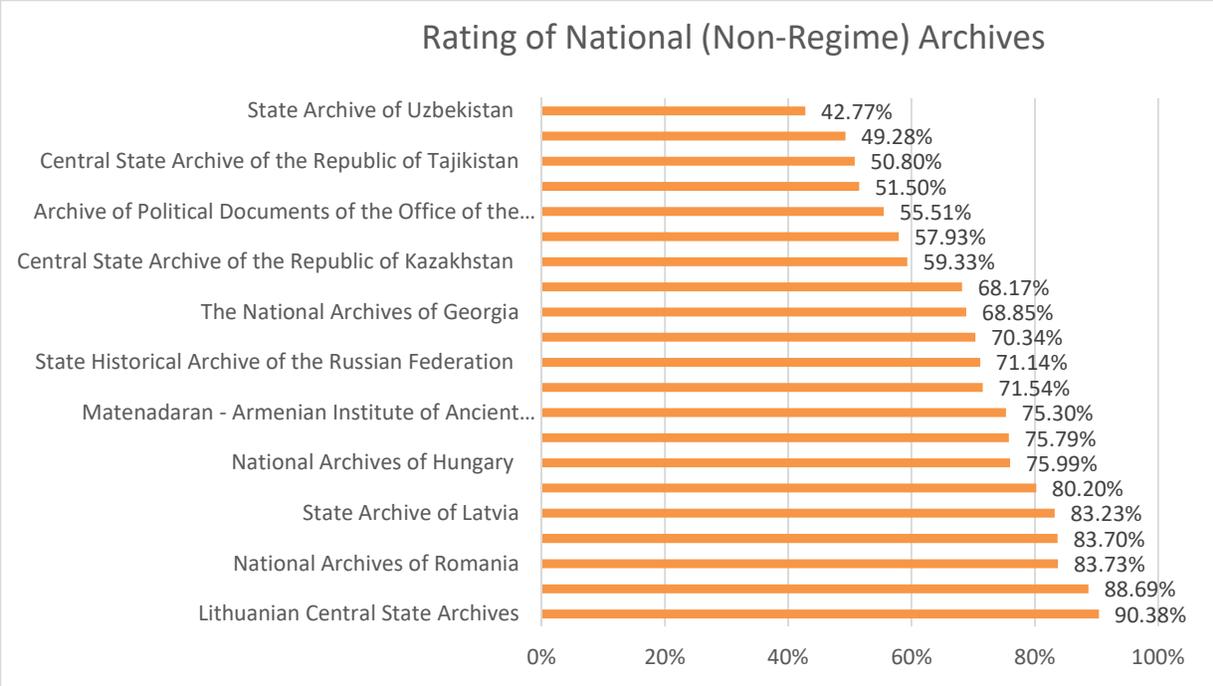


Fig.3 Rating of the National (Non-Regime) Archives

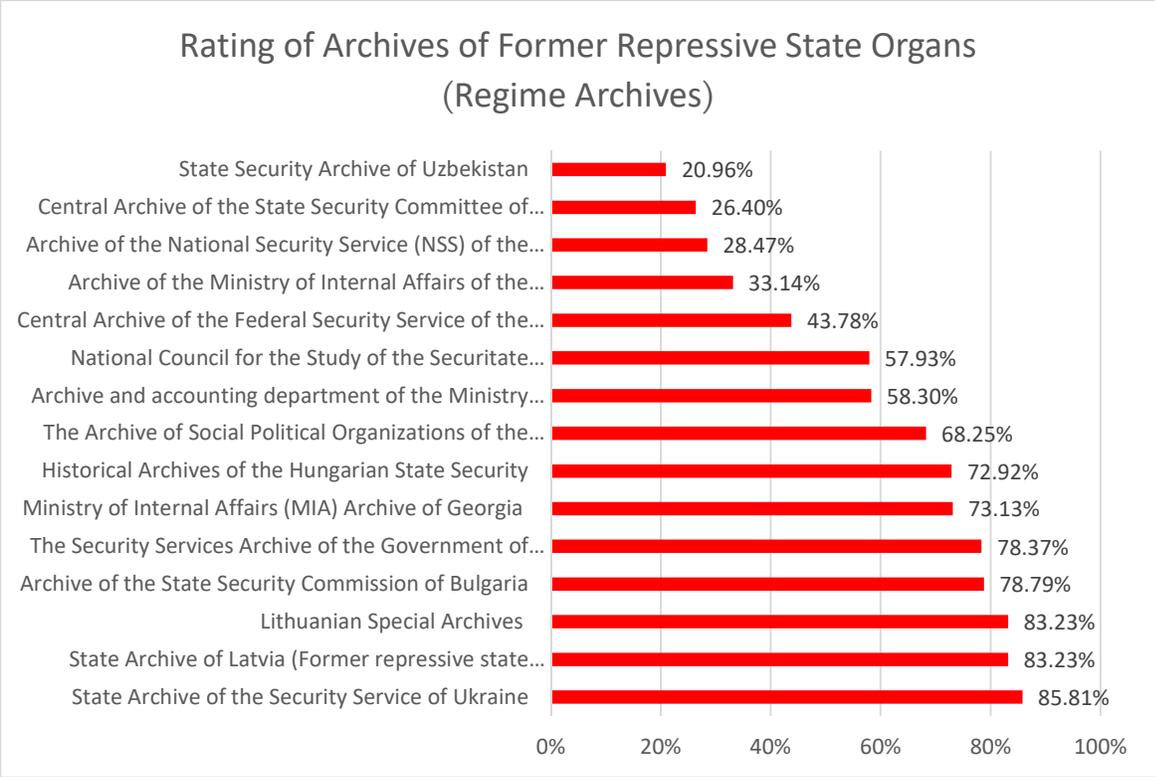


Fig.4 Rating of the Regime Archives

Archival Legislation

Archival legislation is of fundamental importance for enhancing the accessibility of archives. However, researchers mention that, for instance in the Russian Federation and some other countries, the legislation is not always implemented in practice and there are some methods for evading it.

According to the evaluation, Hungary (98.61%) has the best archival legislation, followed by Latvia (97.22%) and 7 other countries that are all former members of the Eastern Bloc and Ukraine, which was a leader of the rating in 2018.

The result is facilitated by the various approaches defined by the European Union in terms of the legislature. The legislature of these countries is synchronized with the EU law⁹ and except for minor differences, they represent a unified system.

According to the specific points of methodology, archives of 17 out of 18 countries have established similar conditions for accessing archives for local and international researchers. Only Uzbekistan, which holds the lowest position in the rating in terms of legislature, has different conditions for its citizens and foreigners. However, the researcher from a western European country, who has an experience of working in the archives of Uzbekistan, mentioned at the conference in 2018¹⁰, it was hard to get access to archives in the beginning, but after the access was granted, the attitude toward foreign researchers was kind and friendly and the employees did their best to help them. As he has observed, it also had particular importance from which country a researcher was.

Regardless of the comprehensive archival legislature, for accessing archives, Hungary requires a detailed research plan, a list of publications and a so-called Statement of Support attached to the Request for a Research Permission. A Statement of Support is issued by an institution on the basis of the detailed research plan. If the Permission of Research is denied the researcher may apply to the court. There are similar approaches in the National Archives of Georgia, where, for accessing reading halls, a detailed research plan has been required during the last 4 years. Meanwhile, the rules for granting access to archives or any other internal regulation, which would describe based on what the access to archives has become more complicated, has not been published yet.¹¹

⁹ Based on the principles of the “Report on Archives in the enlarged European Union Increased archival cooperation in Europe: action plan Elaborated by the National Experts Group on Archives of the EU-Member States and EU-Institutions and Organs at the request of the Council of the European Union” Doc. Number: COM(2005)52/F1.

¹⁰ A researcher who assessed the openness of Uzbekistan archives in 2018 did not want to disclose his/her identity in order to avoid further complications with the archives of Uzbekistan. A local research had the same position in 2019.

¹¹ Such document cannot be found in the section of the National Archive, where the legislative acts are uploaded: <https://archive.gov.ge/ge/samartlebrivi-aktebi>.

Also, it is important to avoid discrimination. Specifically, it is unacceptable to give privileges to the researchers sent by particular organizations (for instance, universities and research institutes). The archives of Belarus and Tajikistan as well as the Polish Institute of National Remembrance have different approaches as, while making a decision about accepting a researcher, they give more privileges to the ones sent by the organizations, universities and research institutes than to the independent researchers.

In line with the international best practice, if a researcher is refused access to documents on a substantiated legal basis, this should be proved in a written form. Also, it is important an applicant be notified in a written form about his/her right to appeal the decision and related procedures (this issue is discussed below).

Another important aspect of the openness of archives is access to particular documents. This encompasses finding aid of the documents that should be available for everyone as well as archival documents. A restriction can be imposed on them with the full compliance with the law. It is unacceptable the archives to have a right to impose such restriction on its discretion in order to avoid misuse of this right, which is also included in our research methodology. It is better the decisions about admissions to archives to be made by a commission or another independent organ.

One of the most important aspects of IDFI's methodology is who is responsible for disclosure and illegal usage of the personal data. There is a principle that the archives do not issue documents until the date set by the state has not passed in order to avoid revealing of secrets or personal information.¹² Considering this principle, the archives can refuse issuing a long list of documents because the majority of the document, especially the documents of the repressive system, contain personal data. Their statistical analysis, the publication of various interesting stories is of paramount importance for the Soviet totalitarian studies. When there were no elections, free media, public opinion survey, the reports of state repressive organs - NKVD, KGB and other organs about the public attitudes can be considered as sources. Usually, the cases of the people who were discontent with the regime preserve the most interesting information.¹³

High-ranking state archives issue the documents containing personal data and lay responsibility on individual researchers on revealing personal information, which, according to our research, is the

¹² “personal data – any information relating to an identified or identifiable natural person. An identifiable person is the one who can be identified directly or indirectly, in particular by reference to an identification number or to the factors specific to his/her physical, physiological, mental, economic, cultural or social identity“; Law of Georgia on Personal Data Protection (5669-ᄁᄁ); Consolidated versions (01/12/2016 - 22/03/2017), Article 2.

¹³ See: Volodymyr SEMYSTIAHA, « The role and place of secret collaborators in the informational activity of the GPU-NKVD in the 1920s and 1930s », Cahiers du monde russe [En ligne], 42/2-4 | 2001, mis en ligne le 01 janvier 2007, Consulté le 28 mai 2020. URL: <http://journals.openedition.org/monderusse/8451>

best practice. This principle is followed by Bulgaria, Moldova, Czech Republic, Tajikistan, Poland, Latvia, Romania, Lithuania, Hungary and Ukraine.

Archives where both the researcher and the issuing body (archive) are responsible: Belarus, Azerbaijan, Kazakhstan, Kyrgyzstan, Russia, Georgia and Armenia. Such an approach cannot be considered as the best practice because an employee at the archives should not be obliged to take such responsibility. Such regulation creates such a situation when employees of archives refuse to issue documents in order to avoid responsibility.

Declassified fonds, files or records that have already been published may not be re-classified. A negative example was monitored in Russia in the 1990s when the declassified documents were re-classified again. Although a great number of materials had already been published and they are accessible via the Internet, such materials are still classified in the Russian archives even though the federal law of Russia does not allow this.¹⁴ Another similar example is Kyrgyzstan.

The principles that (1) declassified fonds, files, or records that have not been published may be re-classified and (2) formerly classified fonds, files, or records cannot be destroyed are especially important in terms of the openness of archives. Some countries have established the best practice as they state that if the state once decided to declassify some sorts of documents, later they cannot be destroyed. There are some countries that do not follow this principle and have no relevant law. Such countries are Belarus, Kyrgyzstan, Georgia and Armenia.

Should it be possible to extend the secrecy period of a document? With regard to this question, the methodology includes the following answers: a) no, it shouldn't; b) should be possible only on a legal basis; c) should be able on the basis of a subordinate legal act (the order of the Director of the Archive or similar). Of course, it is better when the time limits are regulated by the law than when it is regulated by a subordinate legal act which means that the head of archives or other decision-makers acts on their discretion. However, both of these cases can be considered as the worst practices. Such practice is established in Azerbaijan, Armenia, Russian Federation, Belarus, Kazakhstan, Moldova and Tajikistan. In Poland, the Institute of National Remembrance has such right, which is regulated by a separate law.¹⁵

¹⁴ A lot is being written about the problems emphasized by us in the authoritative foreign publications. See a few examples: https://www.bbc.com/russian/russia/2016/05/160527_mironenko_interview_russia_archives
<https://novayagazeta.ru/articles/2008/04/18/38381-nikogda-vy-nichego-ne-uznaete>
<https://meduza.io/feature/2015/07/14/metody-raboty-ne-podlezhat-raskrytiyu>

¹⁵ See: Act on the Institute of National Remembrance – Commission for the Prosecution of Crimes against the Polish Nation.

There is also another threshold in terms of openness when the secrecy period has passed but the state does not declassify the documents and the researchers cannot use them.¹⁶

In Belarus, Armenia, Kazakhstan, Uzbekistan, Kyrgyzstan, Russian Federation, Georgia all of the fonds and archives can be classified for unlimited time as long as the legislature does not prohibit extending the secrecy period for an unlimited time. Also, the Polish Institute of National Remembrance and Security Archives of Lithuania can make some fonds secret (in Poland, this is regulated by the special law on the Polish Institute of National Remembrance and in Lithuania, such entry cannot be found).

The paragraph of the Bulgarian archival law can be considered as the best practice, which includes the list of materials that cannot be classified. Specifically, according to the Act “On Preservation of Classified Information”, it is prohibited to classify and extend the secrecy period of the documents created by the listed institutions from 9 September 1944 to 16 July 1991: State Security Service, Intelligence Service, Bulgarian National Army, including their predecessors and successors as well as the archives of the places for deprivation of liberty, the special archives of the court, investigation and prosecution offices and the archives of the labour- educational schools.¹⁷

The Czech Republic, Ukraine, and Poland have established similar practices and made all documents created during the Soviet / totalitarian period public.

Other Laws Related to Archives

Incorporation of this topic into our methodology was necessary because the archival legislature cannot encompass all laws regulating the relationship between archives and a researcher. Such laws mainly include “On the State Secrets”, “On the Protection of Personal Data”, etc., that play an important role in the direction of the openness of archives.

According to our rating, such legislature fully satisfies the openness standards in Latvia (93.75%) Poland (93.75%), Ukraine (90.625%), Lithuania (87.5%), Moldova (82.22%), Georgia (81.25%), Bulgaria (78.645%). Belarus (8.33%) has been the most underperforming country in this area since 2018. Also, in comparison with 2018 evaluation, Moldova and Ukraine have improved their positions in this component that is related to the changes in their legislature.

¹⁶ For instance, at the Historical Archive of Russia, in 1999, secrecy period of the diaries by Lenin’s personal physician was extended by 25 years. Later, these documents were declassified through the work of one of the human rights defender organization: <https://team29.org/story/leninisdead/> .

¹⁷ Act on Access to and Disclosure of the Documents and Announcing Affiliation of Bulgarian Citizens with the State Security and the Intelligence Services of the Bulgarian National Army. Concluding provisions, § 17.

In the majority of countries, there is a precondition that the historical documents containing personal data can be opened for public use after passing a specified time. As a rule, the time limit in the post-Soviet countries is 75 years after the creation of documents. Such time limit is implemented in Azerbaijan, Belarus, Uzbekistan, Kyrgyzstan, Latvia, Romania, Russia and Georgia. However, in some countries, there are different time limits as well:

- Lithuania - 50 years;
- Hungary - 60 years (if the dates of a birth or death of a person are unknown);
- Kazakhstan - 70 years;
- Armenia and Moldova - 100 years (However, in Moldova, this does not refer to the victims and perpetrators of the crimes of the Communist regime and Holocaust).

Bulgaria, Czech Republic, Poland and Tajikistan do not have such time limits at all.

There is an interesting case in Ukraine where the basic archival legislature sets the time limit of 75 years while the law, regulating the archives of communist-totalitarian regimes, states that a victim of political repression can restrict access to the document concerning himself for 25 years. Also, the Law of Ukraine on Protection of Personal Data does not extend to archives. The accessibility of archival documents is regulated by the Law on the Access to KGB Archive, which does not restrict access to such documents, except for special cases when a victim can use the above-mentioned right to restrict access for 25 years.¹⁸

Besides the established period after the creation of a document, the countries have also established a period after the death of a person, after which the documents containing information about this person can be opened for public use. Many countries have established a 30-years or shorter period for such cases. Often, even after this period has passed, researchers are still restricted to access particular files or documents because they are required present a death certificate of relevant persons at the archives even if the file/document they are interested in contains information on hundreds of persons and archives require death certificates for each of them. Such requirement was present at the National Archives of Georgia when a researcher was refused access to documents because he did not manage to present such certificates.¹⁹

In some countries, specified time should pass after the creation of a document in order to declassify it while the specific period after the death of a person is not established. This means that the document becomes public after a certain period since its creation. In the case of the death of a person,

¹⁸ Art. 9, p.4 of the Law of Ukraine “On access to Archives of Repressive Agencies of Totalitarian Communist Regime of 1917-1991”.

¹⁹ In Georgia, one of the research organization – Soviet Research Laboratory (SOVLAB) appealed against the National Archives after their researchers was requested to present death certificates of thousand of people in order to see the finding aid documents. However, SOVLAB did not win this case. See the news about this case: <http://archive.ge/ka/blog/70>.

permission of his legal heir is required. In other countries, together with the permission from a legal heir, the passing of the specified time is necessary.

There are different approaches in Romania. Romanian law states: “However, the personal files of the high officials of the Romanian Communist Party are not considered private and full access is granted, disregarding if the person is still alive”.²⁰ Bulgaria also has a different approach, where the Law makes a difference based on the affiliation of a certain person to the State Security. The information about officers and agents is not regarded as personal, and it is public (when the name of officer or agent is officially announced by the Committee), while the information for objects and victims is regarded as personal and access is limited to them and their relatives.²¹

For research purposes, access to particular archival funds, whether they contain personal data or not, should be granted before passing of the above-mentioned dates. In this case, four countries that are among the most open countries in the rating, have the best practice: Bulgaria, Czech Republic, Poland and Latvia. In these countries, access to documents or files is granted in case of sufficient substantiation but if the personal information is disclosed, the researcher is responsible for that.

In Azerbaijan, Kazakhstan, Lithuania, Russia, Ukraine and Armenia, such documents can be opened for public use in case of consent from a legal heir while in Georgia, a death certificate is required, which leads to the problems described above.

Some countries do not disclose the information before passing the set date or they do not have defined principles in the law or subordinate legal acts. Such countries are Belarus, Uzbekistan, Kyrgyzstan, Tajikistan and Hungary.

The best practice of archival openness is when the documents about high-officials and their ancestors are publicly accessible. The Polish Institute of National Remembrance was one of the first to implement such practice, which was aimed at the lustration, revealing the crimes committed against the Polish people by the Nazi and Communist regimes in 1917-1990.²² Such a principle is reflected in the legislature of the other countries as well: for example in Romania, this principle has only a form of public agreement as it is not mentioned in the law or other regulations or rules, but the National Archives offer full access to personal files of the members of the “nomenklatura”.

The level of openness of state archives can be linked with the democracy level of particular countries as well as their social system. In some countries, the former Soviet officials, as well as their descendants, may remain in power for what they might not want to make the archival documents public and implement the above-mentioned principle. The reason for this is to avoid the disclosure of

²⁰ Annex No. 5 from the Law on the National Archives no. 16/1996 (republished in 2014).

²¹ Act on Access to and Disclosure of the Documents and Announcing Affiliation of Bulgarian Citizens with the State Security and the Intelligence Services of the Bulgarian National Army, Prom. SG. 102/19 Dec 2006, art. 31.

²² <https://ipn.gov.pl/en/about-the-ipn/2,dok.html>

the deeds or crimes committed by them or their ancestors. The documents about high-officials and their ancestors are not declassified in Belarus, Azerbaijan, Moldova, Uzbekistan, Kyrgyzstan and Armenia.

In the countries with the highest score of transparency, the Law on Personal Data Protection does not apply to the archives or fonds of repressive state institutions. This is yet another example of how the countries with different level of openness act: in some countries, in such documents, all of the data, including names and surnames, is open while in the other countries, the names of eyewitnesses and investigators of particular cases are closed. The countries with the best practices in this direction are Latvia, Ukraine and Kazakhstan.

There is a different practice in Belarus, Czech Republic, Kyrgyzstan, Tajikistan, Hungary, Poland (law on IPN), Georgia, Azerbaijan, Uzbekistan, Armenia and Bulgaria.²³ In these countries, the Law on Personal Data Protection extends to the archival documents as well and the legislature does not consider any exceptions.

Out of the three countries, that ensure access to all documents, Latvia's decision of 2018 was the most important, based on which the KGB archives were opened.²⁴ This should have become the best example for other countries as well. After a year and a half, this practice has not been shared by other, relatively closed countries yet. The achievement of full openness in Latvia was preceded by a lengthy discussion on all of the related problematic issues and possible consequences,²⁵ after which the country decided to ensure full openness.

Archival Services

To some extent, archival services are developed in all of the countries except for Uzbekistan and Tajikistan. Another tendency is that security and national archives do not provide different archival services in the countries with open archives, which is not true for Azerbaijan, for instance, where the Archive of Political Documents of the Office of the President of the Azerbaijan Republic has the score of 86.84% in the component of archival services while the Archive and accounting department of the Ministry of Internal Affairs of the Azerbaijan Republic has 36.84%. Also, in Belarus, The

²³ In Bulgaria "the limitations on access depends not on the organization but on documents collected, namely, whether they contain personal information, which is accessible only to the people concerned and their relatives (in the case of the victims of the repressive political police)".

²⁴ https://idfi.ge/en/opening_kgb_archive_in_latvia_an_useful_example_for_georgia

²⁵ <https://eng.lsm.lv/article/culture/history/a-couple-of-problems-with-the-kgb-files.a302043/>

National Archives of The Republic of Belarus has 72.37% while the Central Archive of the State Security Committee of the Republic of Belarus has 40.79%.

In different countries, the time limits for archival services vary: through the several days' time limits, archives insure themselves as long as the search for particular information is a scrupulous process with a high chance of making mistakes. However, some of our researchers mention that, in practice, a shorter time limit can be used for this service.

National Archives of Georgia has defined the process and time limits in details. There this process is carried out through the Houses of Justice (Public Service Halls) and the time limits are established according to the categories of documents, price and the other conditions.²⁶

Time Needed for Defined time for receiving archival services				
3-5 days	6-9 days	10-12 days	Up to 30 days	Not defined
The National Archives/ Czech Republic	Lithuania	<i>Securitate</i> Archives/ Romania	Latvia	Bulgaria
Ukraine	National Archives/ Romania	The Security Services Archive / Czech Republic		
Uzbekistan	Georgia	Azerbaijan		
	Archive of the National Security Service/ Republic of Armenia	Belarus		
		Kazakhstan		
		Moldova		
		Kyrgyzstan		
		Tajikistan		

²⁶ On the Approval of the Amount of Fees, Procedures for Payment of Fees and Time Frames for Services Rendered by the Legal Entity under Public Law the National Archives of Georgia Operating under the Governance of the Ministry of Justice of Georgia. Ordinance No 506 of the Government of Georgia, 29 December, 2011.

Hungary
Russia

Fig.5: Time Needed for Defined time for receiving archival services

For archival service, the archival fees are minimal or it is provided for free in the following countries: Bulgaria, Azerbaijan, Kazakhstan, Belarus, Moldova, Hungary (service of Historical Archives of the Hungarian State Security is free while the National Archives is not), Poland, Ukraine and Armenia.

Higher than minimal fees are in the following countries: Uzbekistan, Latvia, Lithuania, Georgia, Kyrgyzstan and Romania.

Tajikistan does not have fixed prices and archives determine the price for service on their discretion, which can be considered as a bad practice.

According to our researcher, in the Czech Republic, the archive does not issue of social-legal notices.

In Russia, some notices (for instance, the documents about salary or previous conviction) can be issued for free while for others, payment is required and the fee depends on the type of reference.

Also, it should be noted that some countries have flexible systems – social concessions on price and references for the following groups: persons with disabilities; war veterans and persons with equal status; internally displaced persons/refugees; socially vulnerable; rehabilitated victims of repressions; university students; pensioners. For some archives, these concessions work only partially.

Website of Archives

Website and online communication are essential in the modern world. This became especially apparent during the COVID-19 crisis when people all over the world had to stay home and work remotely. During this period, the only way for historians and researchers to work on archival files was through the Internet, websites and archival fonds, datasets and files uploaded there.

First two archives according to the ranking among the evaluated ones are Lithuanian: Lithuanian Central State Archives (97.86%) and Lithuanian Special Archives (93.57%). Also, a high-quality website and online service are provided at the National Archives of Romania (91.43%), both of the Czech Republic archives: The National Archives of the Czech Republic (89.29%) and The Security

Services Archive of the Government of the Czech Republic (87.14%), and Bulgaria: Archive of the State Security Commission of Bulgaria (87.86%) and The Central State Archive of Bulgaria (83.57%).

The progress of the National Archive of Georgia after 2018 is also notable. It has increased by 21% (from 60.71% to 82.14%) because the archive has taken practical steps for increasing the number of finding aid documents, scanned documents and other materials on the website. Also, they have introduced an adapted version of the website for the people with the visual impairment or vision disability.²⁷ The situation in the second, the MIA archive of Georgia has not changed since 2018.

The archives that do not have websites can be considered as the worst practices:

- Central Archive of the State Security Committee of the Republic of Belarus
- Archive and accounting department of the Ministry of Internal Affairs of the Azerbaijan Republic
- State Security Archive of Uzbekistan
- Archive of the Ministry of Internal Affairs of the Kyrgyz Republic
- Both Archives of Tajikistan
- Archive of the National Security Service (NSS) of the Republic of Armenia
- Central Archive of the Federal Security Service of the Russian Federation

One of the main function of the website is to provide researchers with finding aid and archival documents remotely.

76-100% of finding aid are uploaded on the websites of the following archives:

- National Archives of Hungary
- Lithuanian archives
- Romanian Archives

50-75%:

- Archive of the State Security Commission of Bulgaria (COMDOS)
- National Archive of Georgia

25-50%

- National Archives of the Czech Republic

25%- or less

- National Archives of Belarus
- The Central State Archive of Bulgaria
- The Security Services Archive of the Government of the Czech Republic

²⁷ <https://archive.gov.ge/ge/adaptirebuli-gverdi-1>

- National Archive of Lithuania
- Central State Archives of Supreme Authorities and Governments of Ukraine (CDAVO)

Finding aid is not provided online at the archives of Azerbaijan, Kazakhstan, Uzbekistan, Moldova, Kyrgyzstan, Poland, Russia, Security Archive of Hungary, Security Archive of Ukraine, MIA Archive of Georgia and, of course, the archives that do not have websites.

Online service and online forms are available in the archives of Bulgaria, Latvia, Kazakhstan, Czech Republic, Lithuania, Georgia, National Archive of Belarus, National Archive of Kyrgyzstan, National Archive of Poland, National Archive of Romania, CDAVO Archives of Ukraine, Georgian archives²⁸ and National Archive of Russia.²⁹ Online services and forms are not available in Azerbaijan, Moldova, Securitate Archive of Romania, Security Archive of Ukraine, Hungary and Uzbekistan.

Best practices are observed in the countries where receiving scanned documents is possible, which was once again proved when millions of people had to work from home. Such institutions are:

- Central State Archive of Bulgaria
- State Archive of Latvia
- Both archives of Lithuania
- National Archives of Romania
- State Historical Archive of Russia
- SBU of Ukraine

In addition to the services of researchers, websites should be used by the responsible states and archives to publish the information containing:

1. Forms and samples of administrative complaints
2. Information on the rules of appeal
3. Information on the annual budget of the Archive
4. Information about the income received by the Archive through its archival services
5. Information about public procurement
6. Information about the Archive assets, including the transfer and use of a property.

This information is fully publicized by:

- Both archives of Lithuania
- Bulgarian archive (COMDOS)
- National Archives of Georgia

²⁸ The National Archive of Georgia made this availability during the Coronavirus outbreak. Source: <https://archive.gov.ge/ge/distantsiuri-momsakhureba-1>

²⁹ At the Russian archives, not all notes are provided electronically.

Some archives only partially publish the information while others do not consider it necessary at all. Of course, this does not concern the archives that do not have websites – naturally they do not publish this information.

Through western high standards, online accessibility of archival documents is being introduced using the websites. More and more archival documents are being scanned and uploaded to open access. In 2018-2019, technical advancement of the National Archives of Georgia and uploading of documents, fonds and particular collections was evident.³⁰ At the evaluated archives, scanned documents are already available autonomously as well as within the frames of different European initiatives,³¹ which emphasizes the importance of the unification of the EU legislative framework and services.

Reading Hall

Service at the reading halls of archives is one of the most important practical aspects of the relationship between a researcher and archives. Reading halls are the spaces where the documents are being processed and the work on primary sources is being conducted. Based on this, basic archival-scientific researches are being carried out. Although recently, many researchers have emphasized the importance of moving the reading halls to online space, in the post-Soviet and Eastern European countries they still have great importance.³²

The former Eastern Bloc countries are leaders in terms of the comfortability and accessibility of reading halls. The top 10 reading halls include 8 national and 2 regime archives - State Archive of the Security Service of Ukraine (90.25%) at the 1st-2nd positions and the Lithuanian Special Archives (82.5%) at the 4th position.

Some archives do not have the reading halls at all or their functions is significantly restricted. Such archives are:

- Security Archive of Uzbekistan
- MIA Archives of Kyrgyzstan
- Security Archive of Armenia

³⁰ <https://archive.gov.ge/ge/saarkivo-fondebi>

³¹ <https://www.archivesportaleurope.net/home>

³² Sigrid McCausland, The archives reading room: past, present and future, Paper presented at the fifth International Conference on History of Records, and Archives (I-CHORA). London, 1 July, 2010.

- KGB Archive of Belarus does not allow “ordinary” citizens to access reading halls at all as it has established a defected practice: researchers can get acquainted with documents in the office
- MIA Archive of Azerbaijan - the Archive does not have a sufficiently large room and no more than 2 people can use the place for work (in the office of the chief) at the same time.

Online form or practice for accessing reading halls is not available in Belarus and Kyrgyzstan, as well as in relatively open countries – Kazakhstan, Russia, Security Archive of Hungary (which also requires a lengthy explanation and list of documents in advance), Polish Institute of National Remembrance, Securitate Archive of Romania, CDAVO Archive of Ukraine.

The best practice is when access to the reading hall is granted in 1 day. Many archives have established such a practice.

Archives that make researchers wait for an unreasonably long time:

- In Georgian National Archives, officially, access is granted in 5 working days, but the practice shows that it can also be granted earlier.
- Archives of Ukraine - 3-5 days but in practice, it takes less time.
- In Uzbekistan, a number of days is not defined but in practice exceeds 5 working days.
- In Czech Republic, it takes 5 or more days to get access to reading halls.
- IPN Archive of Poland – 5 days.
- In the Securitate Archive of Romania, the legal time frame is 30 days, but the access is usually granted sooner.

For the simplification of a researcher’s work, it is the best practice when the documents are provided in an online form, which has a function of searching particular documents. 50% or full finding aid documents are provided in such a form at the Central Archives for Modern Records of Poland, National Archives of Latvia and National Archives of Romania.

Finding aid documents are provided only partially (0-50%) in Bulgaria, Czech Republic, Polish IPN Archive, Securitate Archive of Romania, Ukraine. At the Georgian archives, only scanned finding aid documents are provided. Such an opportunity is not available in Azerbaijan, Belarus, Kazakhstan, Kyrgyzstan, Moldova, Uzbekistan, Russia and Armenia.

The best practice is when a researcher receives documents in 1-2 days and many countries have such timeframes.

Archives have different limits on the number of items/documents provided per request, which is rarely more than 20. In the best cases, the number of documents are between 11 and 20, but there are also cases when only 6-10 items/documents are provided. This is fully the discretion of archives because it encompassed many factors such as human recourses, who are responsible for issuing

documents and the level of safety of documents. Also, it happens frequently when more than one researcher has requested the same document/item and the other may have to wait for too long. In such a case, scanning of the documents and their provision in an electronic form is the best solution as it solves all of the above-mentioned problems.

Also, another solution is allowing photocopying at the reading halls, which saves time and recourses of researchers as well as archives. However, archives of not only the former Soviet and Eastern Bloc countries but the western countries with a high level of openness as well have different approaches. Among the evaluated archives, photocopying is allowed in Kazakhstan, Czech Republic, Tajikistan, Poland, Latvia, Lithuania and Ukraine.

Photocopying is not allowed in Belarus, Bulgaria, Azerbaijan, Moldova, Uzbekistan, Kyrgyzstan, Hungary, Romania, Russia, Georgia and Armenia.

Considering the different historical backgrounds of different countries, the conditions of archival documents vary. However, there is almost no archive where the documents damaged to some extent are not preserved. Therefore, checking the condition of documents and their restoration is a permanent process at the archives. Archive, which has finished the restoration of all of its documents, is very rare, considering the laboratory and a long time needed for this work. Meanwhile, the usage of a damaged document at reading halls is forbidden.³³

The above-mentioned creates another, hypothetic problem – archive can refuse access to particular damaged documents and it would be impossible to check whether the document is really damaged or not without the existence of a public list of damaged or lost cases.

It is of paramount importance for state archives to make the records of damaged or lost cases and publicize their list regularly. If any document is restored, it will be removed from the list and vice versa, if any document gets damaged, it should be included in the list with relevant explanation of why it was damaged. IDFI submitted the legislative proposal to the Parliament of Georgia in order to make necessary amendments in the law, also concerning this issue.³⁴

In the countries, where the level of the openness of archives is relatively high, such lists are being created and published proactively. Such countries include Bulgaria, AAN Archive of Poland and Russia, where it is directly regulated by the law.³⁵

³³ George M. Cunha, Frazer G. Poole and Clyde C. Walton, The Conservation and Preservation of Historical Records, *The American Archivist*, Vol. 40, No. 3, Setting Priorities for Historical Records: A Conference Report (Jul., 1977), pp. 321-324.

³⁴ https://idfi.ge/en/idfi_initiative_on_archival_openness_was_discussed_by_the_parliament

³⁵ Правила организации хранения, комплектования, учета и использования документов Архивного фонда Российской Федерации и других архивных документов в государственных и муниципальных архивах,

The best practice is established in Latvia, where a researcher can address archives with the request to restore an item, in which he/she is interested. It should be mentioned that legal and administrative order of restoration of documents is centralised in the system of Lithuanian Archives under the Office of Chief Archivist of Lithuania. All procedures of preservation, restoration or binding are strictly regulated. Hence, all institutions have to consider damage and degree of deterioration the document or file has suffered. There are 3 confirmed categories according to which the process of restoration, preservation or binding should be implemented. The pre-determining the quantity in the process of restoration is crucial.

There are some problems related to reading halls that cannot be included in the methodology, but they still create challenges to the openness of archives. In some of the archives, for instance, in Romania and Hungary, a long list of documents is required for granting access to reading halls. Such documents include copies of the educational degrees, a letter of intentions and for the students a letter of recommendation from their academic supervisor.

In the National Archive of Georgia, substantiation of research objectives and an indication of the chronological frame of the research is required. Therefore, if a researcher needs to study the materials of different periods, he/she will need to fill in the form and go through the procedures of submitting documents for accessing archives again.

In the MIA Archives of Georgia (former KGB archive), the reading hall is merged with the offices of employees, which creates particular discomfort.

National and cultural peculiarities are also notable. For instance, researcher of the project from Tajikistan, in a response to the question on the number of documents issued per request, mentioned: “There are no official restrictions, but usually up to 5-6 documents are accepted. However, through negotiation, you can order more“. Therefore, in such countries, the experience at the archives depends on personal networks with the employees and heads of archives. Project researchers from Uzbekistan also mentioned in 2018-2019 that in the archives of Central Asia, it is important from which country a researcher is as different approaches are being employed according to the nationality of the researcher.

See the table, explaining the access procedures, terms and some key aspects of the work in the archive halls.

музеях и библиотеках, организациях Российской академии наук, утв. Приказом Минкультуры РФ от 18.01.2007 № 19.

Archive	Can I address to archive for access online?	How long does it take to get access to the archive?	How long does it take to receive a document after getting to the archive?	How many archival cases can I receive per request?	Can get a photocopy of an archival document for free?	Is a building adapted for the people with disabilities?
Matenadaran - Armenian Institute of Ancient Manuscripts	Yes	Same day	Same day	6-10 items	No	Yes
Archive of the National Security Service (NSS) of the Republic of Armenia	No	-	-	-	No	No
Archive of Political Documents of the Office of the President of the Azerbaijan Republic (APDOPAR)	Yes	5 days	1-2 days	6-10 items	No	No
Archive and accounting department of the Ministry of Internal Affairs of the Azerbaijan Republic	Yes	10 days	1-2 days	6-10 items	No	No
The National Archives of the Republic Of Belarus	No	1-2 days	1-2 days	6-10 items	No	No
Central Archive of the State Security Committee of the Republic of Belarus	No	-	-	-	No	No
The Central State Archive of Bulgaria	Yes	Same day	3-4 days	11-20 items	No	Partly
Archive of the State Security Commission of Bulgaria	Yes	5+ days	5+ days	20+ items	No	Partly
The National Archives of Georgia	Yes	3-5 Days	1-2 days	6-10 items	No	Partly
Ministry of Internal Affairs (MIA) Archive of Georgia	Yes	1-2 days	Same day	20+ items	No	No

Central State Archive of the Republic of Kazakhstan	No	Same day	Same day	11-20 items	Yes	No
The archive of the Committee on Legal Statistic and the Special Accounts of the General Prosecutor's Office of the Republic of Kazakhstan for the Karaganda region	No	Same day	Same day	11-20 items	No	No
Central State Archive of the Kyrgyz Republic	No	-	Same day	11-20 items	No	No
Archive of the Ministry of Internal Affairs of the Kyrgyz Republic	No	-	-	-	No	No
National Archive of the Republic of Moldova (ANRM)	Yes	1-2 days	3-4 days	6-10 items	No	Partly
The Archive of Social Political Organizations of the Republic of Moldova (AOSPRM)	Yes	1-2 days	3-4 days	6-10 items	No	Partly
State Historical Archive of the Russian Federation	No	Same day	1-2 days	11-20 items	No	Partly
Central Archive of the Federal Security Service of the Russian Federation	No	5+ days	5+ days	20+ items	No	No
Central State Archives of Supreme Authorities and Governments of Ukraine	No	3-5 days	1-2 days	6-10 items	Yes	No
State Archive of the Security Service of Ukraine	Yes	3-5 days	1-2 days	20+ items	Yes	Yes
State Archive of Uzbekistan	Yes	5+ days	Same day	6-10 items	No	No
State Security Archive of Uzbekistan	No	-	-	-	No	No
The Central Archives for Modern Records of Poland	Yes	Same day	Same day	11-20 items	Yes	Yes

The Archive of the Polish Institute of National Remembrance	Yes	5+ days	Same day	6-10 items	No	No
National Archives of Hungary	Yes	3-5 days	3-4 days	20+ items	No	Partly
Historical Archives of the Hungarian State Security	No	5+ days	5+ days	20+ items	No	Partly
Lithuanian Central State Archives	Yes	Same day	Same day	6-10 items	Yes	Partly
Lithuanian Special Archives	Yes	Same day	Same day	6-10 items	Yes	No
State Archive of Latvia (Former repressive state institutions' documents)	Yes	Same day	Same day	20+ items	Yes	No
State Archive of Latvia	Yes	Same day	Same day	20+ items	Yes	No
National Archives of Romania	Yes	Same day	Same day	11-20 items	No	Partly
National Council for the Study of the Securitate Archives of Romania	No	5+ days	5+ days	11-20 items	No	Partly
The National Archives of the Czech Republic	Yes	3-5 days	5+ days	20+ items	Yes	Partly
The Security Services Archive of the Government of the Czech Republic	Yes	5+ days	5+ days	20+ items	Yes	Partly
Film-Photo-Audio Archive of the Republic of Tajikistan	No	Same day	Same day	1-5 items	Yes	No
Central State Archive of the Republic of Tajikistan	No	Same day	Same day	1-5 items	Yes	No

Fig. 6: Procedures, terms and some key aspects of the work in the archive halls

Differences Compared to 2018

Compared to the archives evaluated at the first stage in 2018, only minor improvements were monitored in 2019. All of them are related to practical decisions made by the archives as long as there has been no or minor legislative amendments in the 10 countries evaluated during the first year.

IDFI attempted to improve the weaknesses of the National Archives of Georgia revealed during the first years and submitted a relevant legislative proposal to the Parliament of Georgia. However, the Parliament rejected this proposal. The primary argument of the Legal Issues Committee for not accepting this proposal in its current state was that in the case of substantiation based on scientific or research goals, a researcher would practically have unlimited access to state secrets and personal data, which poses risks. Additionally, the Legal Issues Committee presented the position of the Ministry of Justice regarding allowing photocopying inside reading halls which declared that “photocopying in such a form can bear certain risks in terms of safety of the documents preserved in the National Archives since they will not have a so-called watermark or stamp; also, they can be damaged”.³⁶

Moldova has experienced significant changes and its result has improved by 11% since 2018. According to the researcher who evaluated the archives of Moldova, this was not related to any legislative amendments. The improvement was facilitated by the change of management and approaches at the archives, which has resulted in the improved practice.

Nothing has changed in the archives of Belarus regardless of an active advocacy campaign and social activism by the project researcher, Dmitry Drozd.³⁷

Conclusion and Recommendations

Based on the assessment of the openness of archives, it is concluded that Eastern European countries have a high level of archival accessibility. One of the reasons for this might be that their legislature is harmonized with the European Union legislature.

The archives of Central Asian and post-Soviet countries are more characterized by the individual approaches in their activities than the archives of other countries.

³⁶ https://idfi.ge/en/idfi_initiative_on_archival_openness_was_discussed_by_the_parliament

³⁷ See most recent activities: https://idfi.ge/en/archival_openness_belarus

The transparency of the Ukrainian archives is the best among the post-Soviet countries.³⁸

Latvia's decision in 2018 on the full disclosure of the former KGB archives³⁹ is a precedential case and can become an example of the best practice for the other archives.

The websites of archival institutions and online recourses have acquired new importance in the conditions when during the COVID-19 pandemic many institutions have switched to distance work. Therefore, online recourses will become more demanding, including for saving time and recourses. The finding aid and other data uploaded on the websites of archival institutions play an important role in the development of science.

Based on the results of the research, it is important for the archives to ensure the openness of archives on a legal and practical basis and take the following steps:

- The harmonization and refinement of the legislature, the best example of which is the harmonization of archival legislature of different countries with the EU regulation and their high standard of openness;
- The comprehensive regulation of the issues related to the openness of archives for preventing the heads of archives to have wide discretion and the opportunity to make decisions solely on their discretion;
- Improvement of national legislature and addition of precise definition related to archival documents to the Law on Personal Data Protection;
- Removal of the documents and materials related to the work of repressive totalitarian organs, based on which the identification and rehabilitation of victims is possible, from the scope of the Law on Personal Data Protection.

Archival institutions should consider that:

- It is unacceptable a representative of the archival institution to act on his/her discretion while making a decision on admitting a researcher/citizen to the archives and archival materials. All aspects should be regulated by the legislature.

In the direction of online services, it is important to:

- Elaborate a strategy for providing services and documents online and gradually increase the number of digitized archival materials;

³⁸ Open-Archives.org 2018 and 2019 evaluations. See: <http://open-archives.org/en/rating>

³⁹ <https://eng.lsm.lv/article/society/society/first-batch-of-latvias-kgb-archives-published-online.a303704/>

- Proactively publish the list of damaged and/or lost items. The list should be available on the website and in the reading halls of archival institutions.

As for the researcher services in the reading halls of archival institutions, it is important to:

- Allow the photocopying of archival materials with a personal camera;
- Use contemporary electronic and digitized platforms for providing service to researchers/citizens.