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THE ROLE OF THE DIRECTOR GENERAL OF THE STATE ARCHIVES IN THE DEVELOPMENT OF ELECTRONIC RECORDS MANAGEMENT IN POLAND: AN ANALYSIS OF LEGAL, ORGANISATIONAL, EDUCATIONAL AND INFRASTRUCTURAL MEASURES UP TO 2019[2]

Abstract

Purpose: *The purpose of this paper is to examine action taken by the Director General of Polish State Archives to support the development of electronic records management systems (also referred to hereinafter as "EZD" – Elektroniczne Zarządzanie Dokumentacją) until the year 2019, with a particular focus on legal, organisational, educational and infrastructural facets.*

Method/approach: *The study adopts a qualitative descriptive-analytical approach based on a purposive analysis of legal acts, strategic documents, reports, professional literature and information resources made available by the State Archives. The source material was selected to capture the legal, organisational, educational and infrastructural dimensions of the activities of the Head of the State Archives. Legal acts were examined to identify changes in the normative framework for electronic records management; strategic documents and reports were analysed to reconstruct institutional priorities, implementation directions and reported activities; professional literature and archival information resources were used to contextualise these findings and assess their practical significance. The analysis focused on the period up to 2019 and reconstructed the sequence and interrelations of institutional activities.*

Results: *The analysis demonstrates that the Head of the State Archives played an important role in creating the conditions for the implementation and development of electronic records management systems in Poland across four interrelated dimensions: legal, organisational, educational and infrastructural. The*

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[2] This paper describes action taken by the Director General of Polish State Archives until the year 2019; this is when the position was filled by Paweł Pietrzyk, Ph.D., who has since remained in office.

main outcomes included participation in the preparation of regulations, support for organisational practice and supervision, development of professional competences and dissemination of good practices, monitoring of pilot EZD implementations, and preparation of the Electronic Documents Archive as a tool for the long-term preservation of born-digital archival records.

Conclusions/findings: *Findings indicate that action taken by the Director General of Polish State Archives should be interpreted as a gradual process of developing foundations for a modern public records management model. While the authority did not manage EZD systems directly, it contributed to their development by designing regulations, supporting institutional practice, and preparing archival infrastructure for long-term electronic records preservation. The paper further identifies continuing challenges regarding metadata quality, system interoperability, and the transfer of electronic records for permanent preservation.*

Keywords: *Director General of State Archives; electronic records management; EZD systems; electronic records; public administration; archival supervision; Electronic Documents Archive; digital archives.*

Pursuant to the National Archival Resource and Archives Act, the Director General of Polish State Archives is Poland's central National Archives and Records Administration (NARA) body. The Act further outlines the scope of the Director General's responsibilities, with a particular focus on the oversight of collecting, documenting, preserving, compiling, sharing and securing archival resources. Other activities include the destruction of non-archival records, and co-ordination of archival activities on Polish territory. While the Law does not bestow any direct records management competencies upon the Director General of State Archives, the discharge of overseeing and inspection responsibilities affecting units generating archival resources allows the office holder to impact the process of organising documentation-related processes, including those handled in the digital environment. In that sense, the Director General of State Archives is significant to the design of electronic records management practices in Polish public administration.

The research problem addressed in this article focuses on determining how the *Director General of State Archives*, despite lacking direct authority over the EZD systems, influenced their development within Polish public administration.
Accordingly, the primary research question is: How did the activities of the *Director General of State Archives* up to 2019 contribute to establishing the legal, organizational, educational, and infrastructural foundations that fostered the development of electronic document management in Polish public administration?

Existing literature primarily addresses specific aspects of the digitalization of public administration, the implementation of Electronic Document Management systems, or the archiving of electronic records. This study complements that picture by demonstrating how the *Director General of State Archives* helped shape the conditions for their development and the subsequent preservation of electronic records.

The study is qualitative in nature, employing document analysis and a descriptive-analytical reconstruction of institutional activities. Source materials were selected purposively, guided by the research question and the need to capture both the normative foundations of electronic document management and the practicalities of their implementation. The analysis focused primarily on legislation-including the National Archival Resource and Archives Law, the Act on the

computerisation of operations performed by entities delivering public tasks, and implementing regulations concerning electronic records and EZD systems. This was supplemented by strategic documents, reports on the activities of the State Archives, professional literature, and informational materials made available by the *Director General of State Archives*.

Poland's 2004 accession to the European Union influenced the development of Polish public agency digitisation, with new perspectives of international and expanded archival collaboration arising. Poland joined the proceedings of such bodies as the European Board of National Archives, European Advisory Group, and the DLM (Document Lifecyle Management) Forum. Active participation in the operations of all aforesaid institutions – as well as international projects and conferences – was duly reflected in action taken by the Director General of State Archives. That said, the diversity of member state archival practice has precluded options of full archival policy co-ordination, or one-to-one emulation of foreign legislation in Poland (Stępniak, 2011; Wolnicki, 2015).

In analysing member state experience, Poland began implementing legal regulations in support of greater records handling efficacy early in the 21st century. Laws introducing new terms and definitions associated with digitising public authorities and electronic records handling were passed: Act regarding the computerisation of operations performed by entities delivering public tasks (ACOPEPT) in 2005; Regulation of the Minister of Internal Affairs and Administration regarding essential electronic records design components (REERDC) in 2006; and Regulation of the Minister of Internal Affairs and Administration regarding detailed procedures of electronic records handling (RDPERH), 2006; Regulation of the Minister of Internal Affairs and Administration of November 2nd 2006 regarding technical requirements for recording formats and computer data storage media used to save archival materials transferred to state archives (RTRRFCDSM) in 2006. The Prime Minister's 2009 *"Poland 2030. Development Challenges"* Report proved an essential point of reference for all aforesaid activities. The major issue of poor interoperability between assorted Polish public administration sources and registers had been identified at that early stage already. It was also pointed out that developing knowledge-based administration should be the ultimate goal, in combination with top personal data protection standards (KPRM [Chancellery of the Prime Minis-

ter], 2009). The report set out rules for diagnosing obstacles to digitising the public administration sector, while outlining a broader context for successive activities in the field of electronic records management.

In terms of planning further action, essential assumptions included securing universal access to public information, and options for its reuse. It was duly observed that information saved with the use of assorted technologies can serve current citizen needs while preserving value tying in with its significance for the future. In such context, it became particularly important to set up mechanisms allowing permanent protection and regular archiving of all records generated. The approach fostered the development of systems combining day-to-day records management with their storage and sharing (Wolnicki, 2015).

Under such circumstances, action taken by the Director General of State Archives ought to be interpreted as a major component of the broader process of digitising the public administration sector. Its significance extends beyond supporting the development of electronic records management systems in Polish institutions into the design of institutional foundations for proper and organised electronic records handling.

The implementation of a pivotal paper – the *"National Archives Strategy for the Years 2010-2020"* (*Strategia ["Strategy"]*, 2010) – was a particularly notable development, the document presenting a long-term action plan and fundamental directions for archival development. First and foremost, the plan was a good match for public administration activities associated with public information access and information society building. It was assumed that the efficacy of all action taken ought to be fostered through the successive implementation of state-of-the-art records management systems over the years (Wolnicki, 2015). The "*National Archives Strategy"* pointed to a number of strategic objectives, one of which with a focus on assured efficiency in records management, electronic records included, at institutions responsible for public task delivery. Once thus defined, the objective was divided into operational activities, the first of which involved state archival services' support for new legislative solutions. Consequently, multiple consultation sessions were held to discuss the drafting of normative records management-related laws. These activities were followed up by the dissemination of good records management practices: training courses, workshops, and instruc-

tion and consultation events delivered by public institutions as part of their standard operations. The new and dynamically changing responsibilities faced by the public administration sector gave rise to a need for these institutions to secure permanent and regular skill improvement measures for their staff. Other directions of activity included overseeing records handling procedures at entities delivering public tasks, said oversight defined as inspection, advice and support for aforesaid entities with regard to disseminating good practices in efficient records management. Supervising the process of records valuation – archives expected to join the process as overseers and active participants in equal measure, in line with their mission – was another operational area. Last but not least, one of the identified tasks concerned human resources development in terms of supervising records handling, electronic records included. State archives staff responsible for overseeing the ever-increasing archival resource were expected to continuously improve their competencies in areas of computerising public authorities, electronic systems development, and electronic records generation. All of the above tied directly in with advising the staff of lower-level organisational units (*"Strategy"*, 2010).

Another strategic objective listed in the *"Strategy"* merits a mention as well. It involved "Securing proper conditions of gathering and permanently storing (preserving) the archival resource in traditional and digital formats". The aforesaid objective focused on the tangible foundations of fundamental state archive task discharge. They included the securing, gathering, preserving and maintenance of archival materials. A significant aspect of that objective, related infrastructural projects included the development of a system to collect and manage digitised archival fonds – what would ultimately become the Electronic Records Archives (Mielnik, 2014; *"Strategia"*, 2010; Electronic Records Archives [ADE – *Archiwum Dokumentów Elektronicznych*], 2026) (Drzewiecka & Drzewiecki, 2025).
The year 2010 marked the beginning of a three-year cycle of delivering priorities outlined for state archives operations by the Director General of State Archives. One such priority concerned efforts to prepare archives for the duty of supervising electronic records (*Sprawozdanie* [*"Report"*], 2010; Kurdyk & Wanic, 2017).

All state archives introduced a professional skills improvement programme for staff responsible for delivering archival oversight tasks; the programme close-

ly reflected *"National Archives Strategy"* assumptions. Moreover, representatives of archival administrative divisions employees had actively joined works to draft the Regulation of the Prime Minister regarding office procedure and archival instructions for central and local government administrative structures. The legislation under design was intended as a foundation for electronic records management at public authorities[3]. The drafting of uniform categorisation-based file plans and defining new record categories required particular commitment. All works were preceded with in-depth analyses of pertinent legal status, and newly-drafted archival expert opinions. All aforesaid operations were delivered in collaboration with the Ministry of Internal Affairs and Administration. Experience gained when delivering the pilot EZD system at pre-selected regional authorities of Białystok and Rzeszów was significant as well. The pilot project monitoring exercise comprised first-time inspection activities regarding electronic records management solutions applied in EZD systems, archivists from state archives joining the process (*Sprawozdanie*, 2010).

The aforesaid Regulation of the Prime Minister was issued in early 2011. It was the first legal basis to allow central and local government authorities' commitment to electronic records management (ROPIUFPICA). Notably – while the Director General of State Archives had taken prior action with regard to the use of EZD systems, the Regulation was the first one to actually define the system itself[4]. The enactment of the Regulation gave rise to a succession of conferences, training courses and industry-specific meetings organised with intent to disseminate the Regulation's content and clarify practical options of using electronic records management systems. All such activities helped improve computerisation-related competencies of state archive staff, preparing them for the duty of assisting public administration entities. Similar events and projects targeted the staff of authorities generating or preparing to generate electronic records, and/or using EZD systems already (Wolnicki, 2015).

Introducing state-of-the-art solutions in the field of records management was recognised as a key field of activity for the Director General of State Archives in

[3] We consider this piece of legislation groundbreaking in the context of electronic records management by public administration authorities. For more on the topic, see Drzewiecka, 2021 & 2022.

[4] EZD (Electronic Record Management) system – ITC electronic record management solution supporting office procedures, official case proceedings tracking, and the process of gathering and generating electronic records.

the wake of the Council of Ministers having adopted the National Development Strategy for the years 2007-2015. All activities were designed to improve the efficiency of records management processes at entities charged with delivering public tasks, particular attention paid to electronic documentation (Ministry of Regional Development, 2006).

As part of his works on the Operational Programme *Digital Poland*, the Director General of State Archives drafted general assumptions for the *"Electronic Records Archives"* project. The purpose of the endeavour was to prepare state archives for the process of absorbing *"born digital"* electronic records, generated by state authorities during regular operations and intended for long-term preserving. With a view to relieve central and local government bodies of difficulties associated with the long-term preserving of archival materials, the Director General launched initiatives designed to reduce the time of file preservation by record creators (Stępniak, 2013).

System preparation works were contracted with the NASK Research and Academic Computer Network. This Polish research institute was commissioned by the Director General of State Archives, the project specification defined by a team of experts representing the State Archives Head Office and other state archive bodies. System functionality was reviewed in collaboration with selected public administration units of the central and local level who tested the system in case study conditions[5], using electronic record flow-supporting ITC systems. The solution made it possible to assess the compatibility and usefulness of the designed tool. The primary purpose of the pilot phase was to analyse system functionality, including an assessment of compiled metadata quality. The beta testing version was made available online on the National Digital Archives website, which afforded access to other interested entities as well (Wolnicki, 2015).
System tests closed as of the end of 2019. Thereafter, once a training platform had been launched, state archives staff were offered an opportunity to master the Electronic Records Archives system in e-learning format. The education projects coincided with efforts to stabilise the system and secure operational integration with third-party systems (ADE, 2026).

[5] Beta tester institutions included the State Archives Head Office, Municipal Authority of the City of Chorzów, and Municipal Authority of the City of Częstochowa.

Other noteworthy accomplishments include the development of information resources shared on the official State Archives Head Office website. The *"Electronic Record"* tab on the State Archives' site had been active since 2014, its content initially limited to a set of links to legislation regulating the computerisation of public bodies and electronic records handling (Wolnicki, 2015). The subsequent stage of web service development involved the creation of an *"Electronic Records Archives"* tab taking users to reference materials describing the ADE and EZD systems (ADE, 2026). The educational platform was gradually evolving as well, spanning well-organised information and explanations regarding basic record management topics. Designed with public institutions and other entities in mind, the *"Records Management"* tab was of particular importance. It featured resources on electronic record definitions, record management system types, and record manager responsibilities. Other legal regulations were accounted for as well, including provisions regarding records handling in public administration bodies, the destruction of non-archival records, and records valuation. Said content was supplemented with guidelines concerning problematic or ambiguous situations. They also included required office-and-archival procedure samples, drafted both for EZD system units and entities following traditional office models. All resources allowed adaptation for purposes of and implementation at individual organisational units, according to need and the specificity of operations engaged in (*Zarządzanie dokumentacją* [*"Records Management"*], 2026).

When discussing action taken by the Director General of State Archives, one ought to also account for works to amend the National Archival Resource and Archives Act. In 2006, the Act was expanded to include an entry reading that archival materials shall include electronic records. Another pivotal change was introduced in 2011, when the legislator defined *"electronic records management"* for the first time as *"a form of discharging the duty of assuring the registration, preserving and securing of incremental records"*. This meant that solutions produced by the increasingly common IT technologies – usually regulated by lower-level legislation – had secured statutory backing. Furthermore, legislative amendments had introduced a statutory catalogue of required office-and-archival procedures and harmonised the rules of their drafting, providing for the archival administrative bodies' participation in the process (NARA).

In summary, action taken by the Director General of State Archives prior to the year 2019 was of pivotal importance to the process of institutionally preparing public administration bodies for operation in the electronic records management environment. Rather than direct EZD systems management, the Director's role involved the introduction of legal, organisational, educational and infrastructural conditions conducive to their implementation and evolvement. Actions involving the assessment and joint drafting of legislative provisions were of particular importance, just like working to improve levels of competence amongst state archives and public administration staff; disseminate best practices; and design solutions allowing long-term electronic records preservation. In aforementioned context, the Electronic Records Archive ought to be seen as a key outcome of all activities listed: it combines the issue of day-to-day records management with the responsibility of permanent securing archival materials. At the same time, the development of EZD and ADE systems exposed challenges which have remained current also after 2019 – especially in terms of metadata quality, system interoperability, and efficiency of electronic records submission for perpetual preservation. Action taken by the Director General of State Archives ought to thus be assessed in terms of a process intended to gradually build a state-of-the-art public records management model, wherein state archives are more than a resource-preserving institution: they are an active participant of the digital transformation of the administration system.

AFTERWORD

The analysis described in this paper closes with the year 2019. As indicated in footnote 2, this is when Paweł Pietrzyk took over as Director General of Polish State Archives; he has remained in office ever since. Any reliable assessment of his decisions or performance will be possible once some time has passed; related activities can only be described as recent, making any in-depth or objective evaluation (including direct results or their long-term consequences) unfeasible. That said, selected post-2019 initiatives and actions associated with issues analysed herein can be listed with no precise assessment included. Information presented below should thus not be seen as continuation of the underlying analysis – no more than an addendum, it is intended to highlight the overall direction of changes introduced to state archives in the third decade of the 21st century.

First and foremost, the adoption of the *"National Archives Development Strategy for the Years 2021-2030"* (hereinafter referred to as *"Strategia rozwoju / Development Strategy"*) certainly merits a mention. The Strategy emphasises the need for National Archives to develop new tools associated with overseeing record-generating entities – Electronic Records Management system users. Attention has also been drawn to the demand for improvements to archival staff competencies and adapting their specialisation profiles to the ever-changing conditions of individual task delivery, the shift arising from the computerisation of clerical duties (*Development Strategy*, 2021).

Another operational direction involves the aspect of state archives participating in works to design and implement a uniform Electronic Records Management-class system intended for universal use across public administration institutions. Offered non-commercially since 2022, the EZD RP[6] (*Electronic Records Management for the Republic of Poland*) system is to become a universal and state-of-the-art electronic records management tool intended for general use by Polish public administration. System specification includes comprehensive documentation process handling, including i.a. the generation, flow and management of electronic and hard copy records; individual case file processing; and managing all information gathered. Essential project components include the option of migrating data from other Electronic Records Management-class systems. As reflected in public administration-related digitisation announcements, using Electronic Records Management-class systems by institutions charged with public task delivery shall come into force as of January 1st 2028 (Ministry of Digital Affairs, 2025).

The *Development Strategy* further assumes a boost to the archives' educational role, their offer intended to address users diverse in terms of age and professional communities; archival staff competency expansion; and the use of state-of-the-art educational models, online forms included. The development of a diverse educational offer has been planned, extending to digital forms tailor-made to reflect individual user needs. Related works have also begun with intent to launch an

[6] The Electronic Records Management for the Republic of Poland was developed as part of the *"EZD RP – elektroniczne zarządzanie dokumentacją w administracji publicznej"* (*Electronic Records Management for the Republic of Poland – Electronic Records Management in Public Administration*) IT project delivered by NASK (Scientific and Academic Computer Network) in partnership with the Voivode of the Podlasie Region.

educational archival portal as a state archive educational activity platform (*Development Strategy*, 2021).

One of the *Development Strategy* operational goals involves the development of state-of-the-art legal conditions for state archive operations. The activity schedule includes the drafting of a new National Archival Resource and Archives Law, as well as assumptions and tentative versions of executive regulations. Given the context, the amended National Archival Resource and Archives Law draft approved by the Council of Ministers on July 28th 2026 is of particular importance. Draft solutions embrace the status of digital images (scans) of paper records, principles of handling such records, and requirements for ITC systems, Electronic Records Management systems included (Chancellery of the Prime Minister of Poland, *Projekt/Draft*, 2026).

In 2026, the Director General of Polish State Archives proclaimed a communication regarding changes to purposes listed in the *Development Strategy*. New operational directions include a concept of state-of-the-art competence-and-training centres designed as institutions offering professional advisory services, knowledge development and qualifications improvement, i.a. in areas of electronic records handling and archiving, and records management (Head Office of State Archives, 2026).

A circular published by the Director General of Polish State Archives merits a mention as well: it lays out guidelines for auditing electronic records handling. These instructions were drafted with intent to offer support to state archives staff responsible for auditing electronic records handling by record-generating entities and facilitate reviews of proper record handling by ITC systems. The document ought to be seen as an example of adapting traditional archival oversight instruments to electronic records environment conditions (Drzewiecka, 2023).

The Director General of Polish State Archives and Head Office staff attending conferences and other events with a focus on Electronic Records Management systems development remains a pivotal component of state archives operations. Examples include the Forum of Records Management at Public Authorities, a cyclical national conference addressing individuals responsible for information flow, case file compilation, and correspondence handling at public institutions.

All examples listed herein prove that post-2019 state archive operations include but are not limited to efforts to adapt oversight methods, legal solutions, IT tools and staff competencies to requirements of operating in an increasingly digitised documentation environment. Any evaluation of the efficacy and general usefulness of aforesaid efforts will only be possible in the future.

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POVZETEK

Prispevek analizira vlogo generalnega direktorja poljskih državnih arhivov pri razvoju elektronskega upravljanja dokumentov v javni upravi do leta 2019. Osredotoča se na pravne, organizacijske, izobraževalne in infrastrukturne ukrepe, ki so omogočali uvajanje sistemov elektronskega upravljanja dokumentov, označenih s kratico EZD. Čeprav generalni direktor ni imel neposrednih pristojnosti za upravljanje teh sistemov, je z arhivskim nadzorom, sodelovanjem pri pripravi predpisov in strokovnim svetovanjem pomembno vplival na pogoje njihovega razvoja.

Raziskava temelji na kvalitativnem opisno-analitičnem pristopu in namenski analizi zakonodaje, strateških dokumentov, poročil, strokovne literature ter informacijskih virov državnih arhivov. Z obravnavo zaporedja in medsebojne povezanosti institucionalnih dejavnosti avtorica pojasnjuje, kako so arhivi sodelovali pri digitalni preobrazbi javne uprave in pripravi na dolgoročno ohranjanje elektronskega arhivskega gradiva.

Na pravnem področju so bili pomembni predpisi o informatizaciji javne uprave, sestavinah elektronskih dokumentov, ravnanju z njimi ter tehničnih zahtevah za njihovo izročanje državnim arhivom. Spremembe arhivske zakonodaje so elektronske dokumente vključile med arhivsko gradivo in elektronskemu upravljanju dokumentov zagotovile zakonsko podlago. Poseben pomen je imel predpis iz leta 2011 o pisarniškem poslovanju, enotnih klasifikacijskih načrtih in delovanju notranjih arhivov, pri pripravi katerega so sodelovali predstavniki državnih arhivov.

Organizacijske in izobraževalne dejavnosti so izhajale predvsem iz strategije državnih arhivov za obdobje 2010–2020. Obsegale so strokovno podporo ustvarjalcem gradiva, širjenje dobrih praks, spremljanje pilotnih uvedb sistemov EZD ter

prilagajanje arhivskega nadzora elektronskemu okolju. Usposabljanja, delavnice, posvetovanja in konference so krepili kompetence zaposlenih v arhivih in javni upravi. Spletni informacijski viri so dodatno omogočali dostop do predpisov, pojasnil, smernic in vzorcev navodil za upravljanje dokumentov.

Ključni infrastrukturni dosežek je bila priprava Arhiva elektronskih dokumentov (ADE), namenjenega prevzemanju in trajnemu ohranjanju izvorno elektronskega arhivskega gradiva. Razvoj je vključeval sodelovanje arhivskih strokovnjakov, raziskovalnega inštituta NASK ter izbranih organov javne uprave. Preizkušanje sistema je omogočilo preverjanje njegove funkcionalnosti, združljivosti z drugimi sistemi in kakovosti metapodatkov. S tem se je vzpostavljala povezava med vsakodnevnim upravljanjem dokumentov pri ustvarjalcih in njihovim trajnim ohranjanjem v državnih arhivih.

Avtorica ugotavlja, da je obravnavane dejavnosti treba razumeti kot postopno oblikovanje temeljev sodobnega upravljanja dokumentov v javni upravi. Državni arhivi so pri tem delovali kot dejavni udeleženci digitalne preobrazbe. Med nadaljnjimi izzivi izpostavlja kakovost metapodatkov, interoperabilnost sistemov in učinkovito izročanje elektronskega gradiva v trajno hrambo. Sklepni dodatek predstavlja izbrane pobude po letu 2019, med drugim razvoj sistema EZD RP, posodobitev nadzornih smernic ter nadaljnje pravne in izobraževalne ukrepe, vendar njihove učinkovitosti še ne vrednoti.