

Status Survey and Content Analysis of Archiving Requirements in China's Cultural Heritage Protection Policies

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Abstract

Purpose/Significance: An investigation into the archiving requirements within cultural heritage protection policies aims to grasp the overall situation and main content of cultural heritage archiving policy requirements.

Method/Process: Using web-based literature survey and policy content analysis methods, the archiving content in 147 cultural heritage protection policies was encoded and analyzed.

Results/Conclusion: With the development of China's cultural heritage protection policies, an increasingly prominent demand for cultural heritage archiving policies has initially emerged, alongside continuously enriched archiving entities, expanded and refined archiving objects and contents, utilization-oriented archiving activities, and continuously improved safeguard measures. Overall, archiving is becoming an indispensable foundational task in cultural heritage protection work. Future efforts need to further strengthen the systematization and connectivity of archiving policies, archiving professionalism, and design for digital transformation.

Full Text

Current Status Investigation and Content Analysis of Documentation Requirements in China's Cultural Heritage Protection Policy

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Abstract

[Purpose/Significance] This investigation of documentation requirements in cultural heritage protection policies aims to grasp the overall situation and main content of cultural heritage documentation policies in China. **[Method/Process]** Using network literature survey and policy content analysis methods, this study coded and analyzed documentation content from 147 cultural heritage protection policies. **[Result/Conclusion]** With the development of China's cultural heritage protection policies, a framework has initially emerged featuring increasingly prominent documentation policy demands, continuously enriched documentation stakeholders, expanded and refined documentation objects and content, utilization-oriented documentation activities, and progressively complete safeguard measures. Overall, documentation is becoming an indispensable foundational task in cultural heritage protection. Future efforts must further strengthen policy systematization, connectivity, professional archival management, and design oriented toward digital transformation.

Keywords: Cultural heritage documentation; Cultural heritage protection; Archival records; Policy analysis

Classification Numbers: G122; G270.7

1 Research Background

Cultural heritage constitutes vital cultural resources, and its protection, management, development, and promotion have become priorities for cultural undertakings worldwide. Cultural heritage documentation—the comprehensive, objective, and systematic recording of cultural heritage using archival methods—has become a foundational and important means for cultural heritage protection and promotion [1], playing a positive role in maintaining the authenticity and integrity of cultural heritage [2]. Documentation includes not only collecting existing archival materials but also actively recording cultural heritage through photography, surveying, description, 3D scanning, and digital modeling, as well as the orderly organization of these materials in both physical and digital spaces. To some extent, cultural heritage documentation is synonymous with the construction of cultural heritage information resources. For instance, UNESCO's excellent conservation practice, the “Journey of Many Voices” project, regards the collection, digitization, and database construction of various information resources as documentation work [3].

Documentation has been doubly reflected as an important means in both policies and specific projects for cultural heritage protection and promotion. Internationally, UNESCO's Convention for the Safeguarding of Intangible Cul-

tural Heritage has established documentation as a crucial measure [4]. Projects such as intangible cultural heritage documentation in Nepal [5], Nauru string music documentation in Native American communities [6], and heritage documentation by the U.S. National Park Service [7] have also explored cultural heritage documentation practices. In China, documentation requirements have been clearly stipulated in laws and regulations such as the *Intangible Cultural Heritage Law* and the *Cultural Relics Protection Law*, as well as in normative documents like the *Opinions on Implementing the Project for Inheriting and Developing Excellent Traditional Chinese Culture*. The Ministry of Housing and Urban-Rural Development's *Notice on Issuing the List of Replicable Experiences in Traditional Village Protection and Utilization (First Batch)* (Jian Ban Cun Han [2023] No. 170) even identifies documentation work such as “establishing archival accounts” and “digital recording of intangible cultural heritage” as exemplary practices for cultural heritage protection [8].

However, overall, China lacks systematic discussion on who should be responsible for cultural heritage documentation, what archival records should be constructed, and what documentation requirements and processes should entail. Comprehensive policy surveys can help researchers and practitioners clarify the existing foundation. Since China has not issued specialized cultural heritage documentation policies but instead stipulates documentation-related content within cultural heritage protection policies, this study collectively refers to cultural heritage protection policies involving documentation as “cultural heritage documentation policies.”

Through investigation, this study examines documentation requirements in cultural heritage protection policies to understand the overall policy situation for cultural heritage documentation in China, focusing on: (1) the basic circumstances of China's cultural heritage documentation policies, including their publication dates, issuing bodies, and effectiveness levels; and (2) the specific content of these policies and their stipulations regarding cultural heritage documentation. Based on the findings and combined with practical requirements for cultural heritage protection and fundamental archival management principles, this study assesses the development trend of the cultural heritage documentation policy system and outlines future priorities.

2 Literature Review

Based on literature retrieval and screening, no comprehensive survey research has been found specifically targeting China's cultural heritage documentation policies. Relevant research mainly concentrates in three areas: First, policy and standard research for intangible cultural heritage (ICH) documentation, with Dai Yang et al. investigating and sorting out ICH documentation standards domestically and internationally [9-10], Wang Qiaoling et al. conducting preliminary statistics on eight ICH policies regarding main content, issuing bodies, and document nature [11], and Ye Peng et al. clarifying policy requirements for ICH documentation through typical policy analysis [12]. Second, research on

policy compliance in specific ICH project documentation, with Su Rui [13], Hua Lin [14], and Feng Li [15] respectively studying documentation for Yu Opera, Tibetan ethnic culture, and Thangka culture, investigating ICH documentation policies to clarify legal bases. Third, research on optimized development of cultural heritage documentation based on policy surveys, such as Bian Yuan's proposal for participatory and digital approaches to cultural heritage documentation through relevant policy investigation [16], and other scholars' suggestions for diversified documentation stakeholders [17], documentation of ICH inheritors [18], and archives institutions' participation in ICH documentation [19].

Overall, existing research has preliminarily clarified the nature, subjects, and content of ICH documentation policies, providing useful references for policy analysis dimensions and coding points in this study. However, on one hand, current research either focuses on several important regulations and policies or treats documentation as supporting content for cultural heritage protection, lacking systematic and systematic approaches. On the other hand, existing research fails to fully reflect China's rich and diverse cultural heritage objects and their policy provisions, concentrating mainly on ICH while neglecting other types of cultural heritage that have been addressed in policies, such as the *National Industrial Heritage Management Measures* issued by the Ministry of Industry and Information Technology in 2023, which includes documentation requirements [20].

Therefore, this study adopts network literature survey and policy content analysis methods to comprehensively collect China's cultural heritage documentation policies, conduct statistical and coding analysis, clarify the current content framework and configuration of these policies, and propose recommendations for the future development of China's cultural heritage documentation policy system.

3 Data Collection and Processing

During data collection: (1) Through preliminary research, we identified main source units for cultural heritage documentation policies, including cultural authorities such as the Ministry of Culture and Tourism and the National Cultural Heritage Administration, overall coordination departments such as the General Office of the CPC Central Committee and the State Council, and specialized functional departments such as the Ministry of Commerce, Ministry of Agriculture and Rural Affairs, Ministry of Industry and Information Technology, and the National Archives Administration. (2) We employed a "point-surface combination" approach: first, selecting the "Beida Fabao" database as the primary data source, using "archives," "documentation," "records," and "heritage" as keywords for full-text matching retrieval of currently effective policies and regulations to initially collect relevant policies; second, supplementing policy texts by browsing the government transparency sections of the aforementioned departments' official websites and conducting advanced searches with "heritage" as the keyword. (3) Through full-text reading of policies and regulations, we

further clarified their relevance to cultural heritage documentation, ultimately obtaining 147 relevant policies.

During data integration: (1) We assigned serial numbers from 1 to 147 to the policies according to their nature, extracted cultural heritage documentation-related content to form minimal semantic units, denoted as “1-1,” “1-2” for the first and second minimal semantic units in the first policy, obtaining raw data related to cultural heritage documentation content. (2) We conducted preliminary inductive summarization of extracted original expressions at the minimal semantic unit level to obtain primary coding results. (3) We performed further induction according to documentation subjects, objects, processes, and other elements to form secondary coding. (4) We conducted content aggregation on secondary coding results, ultimately forming five aspects of policy content summary: documentation demands, documentation subjects, documentation objects, processes and requirements, and safeguard measures. Examples are shown in Table 1 and Table 2 .

Table 1 Examples of primary coding results

Table 2 Examples of secondary coding and content aggregation

4.1.1 Temporal Changes in Cultural Heritage Documentation Policies

Statistics on publication dates of the 147 currently effective cultural heritage documentation policies reveal: (1) These policies span a considerable time period, with relevant requirements traceable to 1980, meaning cultural heritage documentation requirements have persisted for over 40 years. (2) Publication frequency has continuously increased, reflecting the urgency of national efforts to promote cultural heritage protection including documentation. Since 2021, 38 relevant policies have been published—nearly 13 policies annually, accounting for approximately one-quarter of the total policies published over 40 years in less than three years. As shown in Figure 1 [Figure 1: see original paper].

4.1.2 Effectiveness Levels of Cultural Heritage Documentation Policies

Investigation of policy effectiveness levels reveals: (1) Cultural heritage documentation policies are widely distributed across various policy documents from laws, regulations, and rules to normative documents and departmental working documents. By effectiveness level, there are 18 (12.2%) high-level documents including laws, Party regulations, and administrative regulations; 24 (16.3%) medium-level documents including departmental rules and State Council normative documents; and 105 (71.4%) departmental normative documents and working files, including 71 (48.3%) departmental normative documents and 34 (23.1%) working files. (2) Different effectiveness levels correlate with policy content emphasis. From laws and regulations to departmental normative

documents, policy focus gradually shifts from top-level design to specific requirements, with cultural heritage documentation requirements becoming relatively more detailed. High-level documents mainly establish principles and propose documentation requirements regarding objects and subjects. Medium-level and departmental normative documents further specify documentation requirements, content, and processes. Departmental working documents primarily focus on business activities of culture, tourism, and cultural heritage departments, reflecting practical demands for cultural heritage documentation. As shown in Figure 2 [Figure 2: see original paper].

4.1.3 Issuing Bodies of Cultural Heritage Documentation Policies

Issuing bodies include the Standing Committee of the National People's Congress, relevant CPC Central Committee departments, the State Council and its constituent agencies. The State Council and its agencies participated in issuing the vast majority of policies, accounting for 80%. Examining central departments' issuance reveals: (1) The National Cultural Heritage Administration and Ministry of Culture and Tourism participated in issuing the most policies (64% of surveyed policies), serving as dominant issuing bodies and playing leading roles in policy content design. (2) The Ministry of Housing and Urban-Rural Development, Ministry of Commerce, Ministry of Industry and Information Technology, Ministry of Agriculture and Rural Affairs, and Ministry of Water Resources are relevant guidance and responsible departments for historical buildings, famous historical towns and villages, traditional villages, time-honored brands, industrial heritage, agricultural heritage, and hydrological cultural heritage, respectively, leading policy design and issuance in their domains. (3) The National Archives Administration participated in formulating four policies on archival document heritage, ancient books, and art archives, three issued as government rules and one as a departmental normative document. (4) Joint issuance is common. The General Offices of the CPC Central Committee and State Council frequently co-issue documents to promote work, with the Ministry of Finance also participating. Additionally, some cultural heritage protection involves multiple departments—for instance, under time-honored brand heritage, the State-owned Assets Supervision and Administration Commission, State Administration for Market Regulation, National Intellectual Property Administration, State Taxation Administration, and National Financial Regulatory Administration all participated in the Ministry of Commerce's documentation policy issuance, while for traditional villages or ancient buildings, the Ministry of Natural Resources and Ministry of Civil Affairs jointly issued documents with the Ministry of Housing and Urban-Rural Development. As shown in Table 3 .

4.2.1 Increasingly Prominent Policy Demands for Cultural Heritage Documentation

Cultural heritage documentation provides an essential information foundation for protection activities, and recognizing its importance is a prerequisite for regulating and guiding documentation work. The fact that 147 cultural heritage protection policies involve documentation content itself demonstrates recognition of this work. China's two most important cultural heritage laws—the *Intangible Cultural Heritage Protection Law* (2011) and the *Cultural Relics Protection Law* (2017)—unambiguously specify documentation requirements. Among the remaining 16 high-level policy documents, 13 explicitly propose documentation requirements. Three important regulations on holistic cultural heritage protection—the *Notice on Strengthening Cultural Heritage Protection* (State Council [2005] No. 42), *Opinions on Strengthening Protection and Management of World Cultural Heritage in China* (General Office of the State Council [2004] No. 18), and *Management Measures for World Cultural Heritage Protection* (Ministry of Culture Order No. 41)—all identify documentation as foundational work.

The survey shows that 44 policies currently explicitly reveal the importance and practical demands of cultural heritage documentation. Among them, the *Guidelines for the Protection of Cultural Relics and Monuments in China*, compiled by China's National Cultural Heritage Administration in collaboration with the Getty Conservation Institute and the Australian Heritage Commission, explicitly identifies documentation as basic work for cultural relics and monuments protection, emphasizing its significance in maintaining authenticity, with 20 references to archives and documentation [21]. The other 43 policies specify documentation's concrete roles in cultural heritage protection, manifested in three aspects:

First, documentation constitutes important content for cultural heritage assessment and grading. Cultural heritage protection requires financial and resource support from local governments at all levels, creating evaluation pressures and grading demands for protection units. In the current policy system, 15 policies require that documentation status be examined during cultural heritage protection unit evaluation, grading, and application processes. Four policies on funding budgets for ICH and cultural relics protection include documentation as part of work content or use archive completeness as an evaluation indicator. Another three policies require that documentation work be incorporated into cultural relics protection or national ICH protection plans and programs.

Second, documentation results serve as important bases for evaluating and accepting cultural heritage protection work. Thirteen departmental working documents explicitly state this, with six mentioning that investigations, administrative law enforcement, and inspections of collection cultural relics should examine documentation status, and three proposing that inspections should cover ICH archive construction based on the *Intangible Cultural Heritage Law's* documen-

tation requirements. The remaining four policies primarily concern documentation effectiveness inspections for famous historical villages, towns, traditional villages, and historical buildings.

Third, whether documentation exists has become important evidence for cultural relics protection, excavation projects, and cultural relics exchange. Four policies require that documentation be reviewed during acceptance of cultural relics protection projects and archaeological projects from a project management perspective. Two policies stipulate that documentation should be an important prerequisite for museum collection cultural relics exchange and exhibition.

4.2.2 Continuously Enriched Stakeholders in Cultural Heritage Documentation

Cultural heritage documentation involves relatively diverse stakeholders, including cultural heritage administrative departments, protection units, social forces, and individuals, with different responsibilities. The survey shows that 53 policies (36.7%) explicitly mention specific work responsibilities for documentation stakeholders.

First, 30 policies (20.4%) stipulate responsibilities for administrative departments such as the Ministry of Culture and Tourism, National Cultural Heritage Administration, and National Archives Administration. By function, these can be divided into: (1) 18 policies requiring relevant departments to conduct business guidance and supervision, with 10 requiring culture and tourism departments, cultural heritage administrations, archives administrations, and film authorities to guide documentation for film archives, collection cultural relics, immovable cultural relics, and ICH; nine establishing documentation filing systems where cultural heritage administrations and culture and tourism departments accept filings from protection units. (2) Eight policies requiring administrative departments to collect, integrate, and build databases of documentation results, with five requiring cultural heritage administrations or designated units and culture and tourism departments to centrally manage documentation results, and three requiring cultural heritage administrations and the Ministry of Industry and Information Technology to build databases for their respective functions. (3) Ten policies requiring people's governments at all levels, cultural heritage administrations, culture and tourism departments, and place-name administrative departments to conduct documentation for world cultural heritage, ICH, and place-name cultural heritage, with three policies vaguely requiring governments to conduct documentation, six requiring culture and tourism departments and cultural heritage administrations to document cultural heritage and related content, and one emphasizing place-name administrative departments' responsibility for place-name cultural heritage documentation.

Second, 31 policies (21.1%) explicitly assign direct documentation responsibility to cultural heritage protection units, reflecting the majority policy choice of having protection units rather than administrative departments responsible.

Among them, 23 policies require museums, libraries, and other protection units to conduct documentation or archival management for collection cultural relics, ancient books, and other heritage. Another eight policies designate specific types of protection units as direct responsible parties, such as ICH project protection units, cultural heritage management institutions, and national archaeological site park management institutions.

Additionally, some policies assign documentation responsibility to social forces and individuals, with three policies respectively requiring ICH inheritors and archaeological activity data clerks to collect, record, and document relevant materials. Moreover, two ICH protection policies published after 2020 began encouraging social forces to participate in ICH collection, recording, and organization, initially demonstrating social participation in cultural heritage documentation.

4.2.3 Expanded and Refined Objects and Content of Cultural Heritage Documentation

Conducting cultural heritage documentation requires clear identification of documentation objects. The survey shows that policies specify documentation objects in two ways: horizontally covering as many cultural heritage types as possible, and vertically enriching and expanding documentation content.

A total of 105 policies (71.2%) directly specify cultural heritage types requiring documentation. (1) Documentation objects basically cover all tangible and intangible cultural heritage, with policies requiring documentation for movable cultural relics, immovable cultural relics, and ICH each accounting for about 30%. Another eight policies target cultural heritage complexes or regional heritage, such as requiring documentation for famous historical villages and towns, traditional villages, or cultural heritage within the Yellow River basin, as shown in Table 4. (2) Regarding temporal span, documentation requirements show two characteristics: First, as time progresses, cultural heritage documentation types continuously refine and expand. Based on when documentation objects first appeared in policies, new tangible and intangible cultural heritage documentation objects have been stipulated across different statistical intervals, with comprehensive heritage being included as documentation objects in the latter three intervals. Second, documentation requirements for important cultural heritage have received long-term attention. Examining only museum collections, ICH, ancient and modern buildings, the Great Wall, and archival documents and ancient books reveals that policies requiring their documentation span more than ten years, demonstrating national-level attention. As shown in Figure 3 [Figure 3: see original paper] and Figure 4 [Figure 4: see original paper].

Thirty-nine policies (26.4%) specify concrete documentation content, covering three aspects: cultural heritage 本体 information, management activities, and protection subjects, as shown in Figure 5 [Figure 5: see original paper]. (1) Regulations on heritage 本体 documentation content focus on two aspects: First,

regarding record types, eight policies require forming textual, photographic, rubbing, and audio-visual materials related to heritage 本体, reflecting requirements for multi-modal, comprehensive recording. Second, regarding record content, requirements vary by heritage 本体 type—for immovable cultural relics and comprehensive heritage, basic information is generally required through surveying and mapping, while for ICH, archives reflecting craft processes and core techniques are required. (2) Heritage management activities constitute important documentation content, with protection, restoration, promotion, monitoring, inspection, and archaeological work receiving considerable attention. Additionally, heritage withdrawal, demolition, and related research activities and results must be included, meaning documentation requirements have expanded to cover all aspects of heritage management. (3) For cultural heritage, inheritors or protectors are also documentation objects, with three policies requiring documentation of ICH inheritors and one requiring documentation of Great Wall protectors.

4.2.4 Utilization-Oriented Cultural Heritage Documentation Activities

How to conduct cultural heritage documentation is practically significant policy content, primarily focusing on basic processes, methods, and subsequent integration and utilization—main content for medium- and low-effectiveness policies. Thirty-five policies (23.6%) stipulate overall requirements, preliminary work, supporting activities, and implementation methods. Among them: (1) Ten policies clarify documentation requirements, including four on ICH documentation for time-honored brands, traditional performing arts, and crafts requiring systematic, comprehensive, and authentic documentation; three on cultural relics documentation requiring standardization; and two on archaeological sites and historical villages requiring dynamic documentation processes. (2) Twenty policies specify preliminary and supporting work, with 17 identifying investigation and organization as important prerequisites for ICH and immovable cultural relics documentation, plus specific supporting activities for different objects—for immovable site heritage requiring long-term monitoring and scanning, documentation is premised on monitoring and surveying. (3) Fifteen policies emphasize basic documentation methods, with multimedia recording emphasized in early policies (four pre-2011 policies proposing text, audio, video, and surveying), gradually being replaced by digital approaches emphasized in 13 policies for collection, surveying, and documentation.

Centralization, integration, and effectiveness of documentation results constitute important policy content stipulated in 24 policies. First, eight policies require cultural heritage administrations and film art archives institutions to collect and centrally manage relevant archives. Second, 17 policies explicitly require forming catalogs, lists, or archival/resource databases, with 10 specifying resource databases for ICH such as time-honored brands, place-name heritage, performing arts, silk craftsmanship, and fishing culture, and others requiring

archival databases for specific heritage like industrial heritage, corridor bridges, and film art archives.

Cultural heritage documentation is not solely oriented toward forming and integrating archives—effective utilization of documentation results is also a major policy requirement, explicitly demanded in nine policies, seven published after 2019, reflecting accelerating importance of utilization. Regarding utilization objects, four policies target ICH, with others addressing large-site cultural relics, industrial heritage, and historical buildings. Regarding utilization content and methods, two propose publishing documentation catalogs and lists, four require providing access through databases, resource libraries, or open platforms, and policies on historical districts and buildings propose that historical building archives formed through surveying should interconnect with urban information models.

4.2.5 Progressively Complete Safeguard Measures for Cultural Heritage Documentation

In-depth development of cultural heritage documentation requires corresponding safeguard measures. The survey shows that 23 policies (15.5%) stipulate requirements for institutional mechanisms, facilities and equipment, and standard construction.

First, 43.5% of safeguard measures require relevant cultural heritage protection participants to establish documentation institutional mechanisms, including forming documentation systems and configuring corresponding institutions and personnel. Specifically, five policies propose archival system construction requirements for collection cultural relics protection units and administrative units; two require archival management systems for art archives like film; three require investigation and recording systems and archival systems for ICH; two require art archive formation departments and management departments to have archival management departments and personnel; and one requires national archaeological site parks to have archival management functions.

Second, requirements include configuring appropriate infrastructure for cultural heritage archive collection, organization, and utilization, including venues, equipment, and digital infrastructure. Two art archive-related regulations require documentation units to have archival preservation equipment and venues, five policies require forming corresponding cultural heritage information management systems, and two require using digital means to create open platforms for cultural heritage and data.

Additionally, two policies mention standard construction for cultural heritage documentation, and one stipulates publicity work for archival document heritage, both being important measures for effectively improving documentation work.

5.1 Richer Policy Content Yet Insufficient Systematization

Through investigation and analysis, we find that documentation content in China's cultural heritage protection policies is continuously enriching. Under the guidance of the *Intangible Cultural Heritage Protection Law*, *Cultural Relics Protection Law*, and *Convention Concerning the Protection of World Cultural and Natural Heritage*, documentation elements in cultural heritage protection policies have become increasingly rich, forming a basic content framework covering documentation demands (why document), documentation subjects (who documents), objects and content (what to document), documentation activities, and safeguard measures (how to document). At the specific object and activity levels, on one hand, identification of documented cultural heritage has become increasingly refined and extended, with specific objects like museum collections, industrial heritage, and red slogans being included in documentation categories beyond ICH. On the other hand, documentation activities have gradually enriched with technological development, with digital surveying, scanning, and monitoring for immovable cultural relics becoming required documentation actions.

Meanwhile, the systematic nature of cultural heritage documentation policy requirements remains insufficient, mainly manifested in the relatively common homogenization across different effectiveness levels. Currently, policies from laws and Party regulations to government rules generally stipulate objects, subjects, and content. However, an ideal policy system should concretize and refine requirements top-down, with medium- and low-level policies—which constitute the majority—containing more detailed requirements on documentation content, activities, methods, and safeguards. However, the survey shows that policies on documentation objects account for the largest proportion (71.6%), followed by documentation subjects (36.7%), with documentation content (26.4%), documentation activities (23.6%), and safeguard measures (15.5%) decreasing sequentially. This means most policies generally stipulate who should document which cultural heritage, but less frequently address what specific content to record or what archival activities to conduct. Furthermore, although the basic content framework is relatively complete, the systematic degree may be limited for specific cultural heritage types. For instance, ICH documentation policies for time-honored brands, performing arts, and crafts emphasize authenticity and comprehensiveness, while tangible cultural heritage protection policies lack similar provisions.

5.2 Expanding Policy Coverage Yet Weakened Connectivity

Through over 40 years of development, China's cultural heritage documentation policies have formed a preliminary and substantial policy group, gradually moving toward full coverage. Key manifestations include: First, relatively clear and dominant policy-making institutions have emerged, with the Ministry of Culture and Tourism and National Cultural Heritage Administration responsible for nearly 73% of policy issuance, with frequent joint issuance with the

Ministry of Commerce and Ministry of Housing and Urban-Rural Development. Second, policy requirements now cover full effectiveness levels from laws and regulations to departmental working documents, forming a relatively appropriate distribution pattern. Third, policy utilities have diversified, including macro-level documentation requirements playing a “pull” role and working documents playing a “push” role to promote implementation, with multiple utility types cooperating to gradually ground documentation work and reflecting how policy systematization promotes concrete implementation.

However, beneath this full-coverage development trend, current cultural heritage documentation policies still suffer from insufficient connectivity, specifically including: First, internal structural defects exist. Most current laws, administrative regulations, departmental rules, and normative documents make relatively broad and principle-based provisions on documentation, while departmental working documents focus on using documentation and its results as important prerequisites and evidence for work implementation, reflecting documentation demands. Yet between these two policy types, intermediate policies guiding “how to document” are lacking. Only some archival heritage management work has relatively detailed provisions on “how to document,” with limited content in other policies. Second, connectivity is limited between documentation requirements for similar objects and different objects. For instance, some ICH protection policies identify administrative departments as documentation subjects while others identify protection units, causing practical confusion. Third, connectivity between existing cultural heritage documentation policies and external relevant cultural policies is limited, including both specialized archival policies and development strategies like Digital China and cultural digitization. For example, the Ministry of Culture and Tourism issued the *Opinions on Promoting High-Quality Development of Digital Culture Industry* as early as 2020 [22], emphasizing guidance and regulation of public data resource openness and flow, yet among 38 cultural heritage documentation policies issued since 2021, only six (15.8%) mention database or resource library construction for documentation, with even fewer addressing data-level collection and open utilization.

5.3 Clarifying Documentation Requirements Yet Needing Professional Depth

The large number of published cultural heritage documentation policies reflects not only system construction but also gradually clarified documentation requirements from a business perspective. Cultural heritage documentation has become a foundational activity for cultural heritage management, protection, and promotion, with related work becoming inseparable from documentation in practice. Business guidance departments such as the Ministry of Culture and Tourism and National Cultural Heritage Administration have incorporated documentation work and archival status as important indicators and bases in their evaluation, guidance, and supervision activities. Taking the Great Wall as a typical example, according to policies including the *Great Wall Protection*

Regulations, Great Wall Protector Management Measures, Great Wall Law Enforcement Inspection Measures, Guiding Opinions on “Four Haves” Work for Great Wall Protection, and Guiding Opinions on Great Wall Protection and Maintenance, inspection patrol materials, protection and restoration work, the Great Wall’s condition information, and protection task executors all become documentation objects.

However, from the perspective of archival professionalism, the professional attributes of documentation activities have not been fully explored. Main manifestations include: First, conceptual understanding of documentation remains unclear. Current policies primarily understand “documentation” as a process and activity in cultural heritage protection work, without fully establishing professional requirements for authenticity, integrity, usability, and security. Second, professional documentation requirements are not detailed. Although some policies contain preliminary requirements like authenticity and completeness, archival requirements for authenticity, integrity, and completeness in the sense of archival science are not clearly defined for the process of collecting and archiving relevant information, materials, and documents. Third, specific documentation processes—namely, how to meet documentation requirements—are insufficiently explained. Process requirements remain mostly principle-based, lacking detailed elaboration on archival management requirements such as classification, numbering, and appraisal, making it difficult to guide concrete work at the operational level.

In 2000, when the national informatization strategy was initially established, cultural informatization was an important application field. In 2022, the General Offices of the CPC Central Committee and State Council jointly issued the *Opinions on Promoting Implementation of the National Cultural Digitization Strategy*, clarifying the strategic goal of “comprehensive presentation of Chinese culture and universal sharing of Chinese cultural digitization achievements.” The digital trend in cultural heritage documentation policies has also initially emerged, with 13 policies (8.8%) emphasizing digital collection methods, 16 policies (10.9%) requiring formation of cultural heritage archival databases or resource libraries, and four policies (2.7%) requiring provision of documentation resources through databases, resource libraries, or open platforms.

Compared with the vigorous implementation of China’s Digital China construction and cultural digitization strategy layout, digital transformation in cultural heritage documentation policies remains limited. First, provisions on domain integration and resource aggregation of documentation results are limited. Current aggregation mainly occurs within specific heritage types, forming separate databases for collection cultural relics, industrial heritage, and silk craftsmanship, lacking requirements for interconnection and integration. Second, data quality requirements for documentation results need strengthening. Current requirements mostly focus on general demands like authenticity and comprehensiveness, without clearly specifying quality requirements like discoverability, usability, and interoperability. Third, integration between inclusive and eq-

uitable public cultural service-oriented documentation results and utilization methods with digital transformation remains insufficient. Digital exhibitions are only proposed as general service methods, still far from the appeal and influence required by cultural digitization, with data openness, platform, and tool design for cultural heritage documentation requiring further clarification.

This investigation of documentation requirements in cultural heritage protection policies has preliminarily clarified policy issuance frequency, hierarchical structure, and content framework, helping grasp and reflect on policy requirements from a holistic perspective. Future cultural heritage documentation policies will continue deepening development across five aspects—documentation demands, subjects, objects, processes and requirements, and safeguard measures—strengthening policy systematicity, connectivity, and professional archival management degree, while actively responding to cultural digitization strategy demands for digital cultural heritage protection.

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Author Contributions

HE Tantaο: Identified research questions, designed research plan, organized and analyzed data, wrote and revised the paper.

LIU Yuenan: Proposed research ideas, designed research plan, wrote parts of the paper and provided overall revision.

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Note: Figure translations are in progress. See original paper for figures.

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