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# **IHRA Guidelines for Identifying Relevant Documentation for Holocaust Research, Education and Remembrance**

# **About the IHRA**

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The International Holocaust Remembrance Alliance unites governments and experts to strengthen, advance and promote Holocaust education, remembrance and research worldwide and to uphold the commitments of the 2000 Stockholm Declaration and the 2020 Ministerial Declaration.

The *IHRA Guidelines for Identifying Relevant Documentation for Holocaust Research, Education and Remembrance* were adopted on 10 November 2021 during the Thessaloniki Plenary by the IHRA's 35 Member Countries.

We are very grateful to the following organizations who lent their advice and expertise to the project group who drafted the Guidelines: the European Archives Group (EAG), the European Board of National Archives (EBNA), the European Holocaust Research Infrastructure (EHRI) and the European Union Diplomatic Archives (EUDiA).



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# **Preface**

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**For decades, a significant amount of the documentation bearing on the Holocaust and its historical context has been scattered, endangered and in many cases made inaccessible.**

The Nazis, their allies and collaborators not only murdered Jews, Roma,<sup>1</sup> political enemies and other victims; they also endeavored to destroy their culture. Therefore, each and every document pertaining to the life of these victims before, during and after the Holocaust is extremely valuable.

Allowing open access to Holocaust documentation and material is important as it is a part of the IHRA Member Countries' declaration to "share a commitment to throw light on the still obscured shadows of the Holocaust" and to "take all necessary steps to facilitate the opening of archives in order to ensure that all documents bearing on the Holocaust are available to researchers."<sup>2</sup>

As laid out in the "H2020 Program Guidelines on FAIR Data" drawn up by the European Union Horizon 2020 program in 2016, archival data should be "as open as possible and as closed as necessary" — "open" in order to foster reusability and to accelerate research, but at the same time "closed" to safeguard the privacy of the subjects.

How this looks in practice is more complicated, however. In all EU Member States, national legislation sets rules regarding access to documents kept in public archives. The closure period for documents containing personal data differs from country to country and, in addition, is determined by the nature of the personal data. This variation led the International Holocaust Remembrance Alliance's "Archival Access Project" to map the status of accessibility to Holocaust-era documentation and the challenges faced by researchers.

The project also contributed to ensuring that a specific exception for documents bearing on the Holocaust was included in the European Union's General Data Protection Regulation (GDPR) (regulation EU 2016/679 of 27 April 2016). EU regulations like the GDPR are binding legislative acts which must be applied in their entirety across the Union. Passed by the European Parliament in 2016, the GDPR replaced previous data protection legislation, thereby allowing for more uniform norms across all Member States. However, the GDPR left some room for States to introduce exemptions in specific areas, such as for archiving purposes in the public interest or for historical research.

Concerned over the unintentional effects the GDPR may have on access to Holocaust-related material, the IHRA opened a dialogue with the European Parliament in 2015.

Due to the IHRA's dialogue with the European Parliament, Recital 158 was added to the GDPR during the legislation process. The recital reads:

**“Where personal data are processed for archiving purposes, this Regulation should also apply to that processing, bearing in mind that this Regulation should not apply to deceased persons. Public authorities or public or private bodies that hold records of public interest should be services which, pursuant to Union or Member State law, have a legal obligation to acquire, preserve, appraise, arrange, describe, communicate, promote, disseminate, and provide access to records of enduring value for general public interest. Member States should also be authorized to provide for the further processing of personal data for archiving purposes, for example with a view to providing *specific information related to the political behavior under former totalitarian state regimes, genocide, crimes against humanity, in particular the Holocaust, or war crimes.*”<sup>3</sup>**

The IHRA's involvement was very successful. The absence of an amendment to the law excluding Holocaust documentation would have made it very difficult to access such documentation in the future. Although the GDPR has been in force since May 2018, it is apparent that the mere inclusion of the exception clause does not necessarily guarantee access to collections of Holocaust documentation in Europe and throughout the world.

Today, there still are countries both in the EU — as well as outside the EU — that impose legal and practical obstacles to accessing Holocaust documentation. One obstacle is the lack of practical guidelines for identifying relevant documentation for Holocaust research, remembrance and education, which unfortunately means each archive and each state can adopt its own approach to determining access to this documentation.

When a country, following particular historical events, retains records produced by the authorities of other states, it is desirable for that country to also ensure that these materials can be accessed as widely as possible.

**The purpose of these guidelines is to offer a unified tool for identifying relevant documentation for Holocaust research, remembrance and education which will assist archives and other entities in assessing their collections and allowing access to relevant documentation. For countries that are subordinate to the GDPR, this definition will also assist in the implementation of Recital 158 by offering a practical definition to the term *“specific information related to the political behavior under former totalitarian state regimes, genocide, crimes against humanity, in particular the Holocaust.”***

The first part of this document includes the “working definition of Holocaust-related materials” drafted by the IHRA in 2012. This definition aims to list materials that should be considered Holocaust-related. The second part of the document includes practical tools for identifying documents that are **not included** in the definition but are relevant to Holocaust research, remembrance and education. The third part includes examples of types of records that should be identified as Holocaust-related when implementing the guidelines.

# **The IHRA Working Definition of Holocaust- Related Materials<sup>4</sup>**

Holocaust-related materials must have their origin in the period from the end of the First World War, extending forward to the close of Displaced Person camps in the 1950s, and must pertain to the legal, political social, economic and cultural status of groups that became subject to state policies and/or persecution during the core period of 1933–1945. Exceptions to these temporal parameters include materials from Holocaust-related war crimes trials; testimonies about the Holocaust and its deniers; Holocaust commemoration and memorialization; asset and compensation-related materials; and records that are part of larger collections yet remain relevant to Holocaust history.

## **Types of materials include, but are not limited to:**

- Textual records, including but not limited to government documents, legal proceedings, institutional records, personal papers, diaries, memoirs and correspondence;
- Electronic copies, facsimiles, casts, microfilm and photographic reproductions;
- Works on paper, including but not limited to broadsides, announcements, advertisements, leaflets, posters and maps;
- Footage and films;
- Audio and video interviews;
- Books, pamphlets, manuscripts and transcripts;
- Musical recordings and scores; and
- Originals and copy prints of photographs, photographic albums, transparencies and photograph negatives.

Materials relevant to study of the Holocaust inform a wide range of subject areas, the most important of which relate to the systematic and state-sponsored murder of approximately six million Jews and approximately half a million Roma in Europe and North Africa by the Nazi regime and collaborators. In addition, such materials inform a wide range of related subject areas.

### **These subject areas may include:**

- Pre-war communal life of victim groups in those areas affected by the Holocaust;
- The Nazi rise to power in Germany and the rise of fascism and ethnically oriented ideologies and policies in other European states;
- Nazi racial “science” and the propaganda campaign against Jews, Roma and other groups targeted by the Nazis prior to the start of the Second World War and the Holocaust;
- Nazi anti-Jewish policy in the 1930s;
- The flight of victim groups from Nazi-occupied Europe;
- Refugee communities in various countries;
- The response (or lack thereof) of the international community to the rise of Nazism and the persecution of Jews and others;
- The policies and practices of Nazi occupation;
- The roundups, deportations and murder of European Jewry;
- Mass shootings as conducted by Einsatzgruppen, other German units, indigenous police, auxiliary units and collaborators;
- Ghettos, concentration camps, labor camps and killing centers;
- The fates of Poles, Roma, homosexuals, Jehovah’s witnesses, people with physical and mental disabilities, Soviet prisoners of war, political enemies and other groups targeted during the Second World War;
- Persecution of and by indigenous populations in Nazi-controlled and Nazi-allied Europe;
- Nazi collaborators in relevant countries;
- Regimes of Nazi satellite states and their treatment of the populations under their control;
- Resistance to Nazi policies and actions;
- Rescue;

- Life in hiding during the Holocaust;
- Discovery and disclosure of labor, concentration and death camps;
- Liberation of Holocaust survivors;
- The search for and apprehension of war criminals;
- War crimes trials;
- Experiences of survivors after liberation;
- Bricha and other escape and rescue movements;
- Jewish experiences in DP camps and elsewhere after liberation;
- Immigration to Palestine, the United States and other countries after the war;
- Claims for restitution and reparations;
- Holocaust memorialization and commemoration;
- State-sponsored historical commissions; or
- Contemporary documentation concerning Holocaust denial and distortion.

Reported research results will distinguish as much as possible experiences and data pertaining to records relevant to the study of the Holocaust from those relevant to other Nazi crimes.

# **General Guidelines for Identifying Relevant Documentation for Holocaust Research, Remembrance and Education**

Although the [IHRA working definition of Holocaust-related materials](#) is broad and extensive, it cannot cover all types of documents and materials created and collected over the years in archives and other entities all over the world. The following general guidelines help identifying and classifying documents and materials which cannot be defined under the working definition.

## **When identifying and classifying documentation, the following guidelines should be implemented:**

- Open access means allowing researchers and the public to find and use Holocaust-related documentation for research, education and remembrance. Open access does not take precedence over privacy regulations, but rather encourages archives to implement these principles with good judgment in a way that balances interests of privacy with the competing imperatives of open Holocaust research.
- Holocaust-related documentation should be classified in an open-ended way, both geographically and in terms of time of creation:
  - Geographically — Holocaust documentation can originate from sources anywhere in the world and could be held today in any country.
  - Time frame — The temporal parameters of Holocaust documentation extend backward to the beginning of the twentieth century until the present day. This includes, for example, documents related to displaced persons (DP) camps, Holocaust war crimes trials, testimonies about the Holocaust and its aftermath, police and prosecutor records, migration files, person-search files and materials regarding restitution and compensation efforts, testimonies, memoirs and other “victim sources,” and commemoration efforts.

- These records include documents created or held on local, regional, national and international levels.
- A collection is Holocaust-relevant as soon as one document or file within it is Holocaust-related.
- In many cases, file descriptions in the archival catalogue do not necessarily imply that the documents in the file are Holocaust-related. It is advised that the file and documents in it be examined in light of the IHRA working definition and these guidelines.

## **Types of Records Which Should be Identified as Holocaust-Related Materials**

It is important to stress that relevant records can be pre-Holocaust, Holocaust-era and post-Holocaust.

### **The following list of examples is not exhaustive:**

- Documentation of Jewish pupils and teachers in local schools and universities (Ministry of Education files);
- Documentation of ID cards, passports, records of citizenship and residence (Ministry of Interior or police files);
- Fascist racial “science” and anti-Jewish policy;
- Sanatorium/asylum files, which are central to the study of NS “euthanasia” (1940–1945) and the crimes committed under the guise of medical research;
- The flight of victim groups within or from Nazi-occupied Europe and Fascist-occupied countries;
- Refugee communities in various countries;
- Censuses and property censuses of Jews and enforcement of anti-Jewish measures;
- Records about collaborators (national and local offices of Ministry of Interior, police and municipalities);
- Cadastre records of real estate ownership;
- Banking and insurance companies’ records;

- Art dealerships and auction houses' records;
- Museum and library acquisition and other records;
- Tax and notary records, chamber of commerce and other financial documentation in public and private archives, including records of auditing;
- Church records;
- Employee files in private and public institutions;
- Documentation regarding confiscation, looting and dispossession of property;
- Hospital records;
- Archives and records of Jewish congregations and communities;
- Rescue and humanitarian support by neutral countries, including visa policy for refugees;
- Personal data in records regarding the de-nationalization processes;
- Social relief records;
- Files regarding reintegration and/or return of victims in the post-war societies, social welfare measures and laws in favor of former victims;
- Post-Holocaust engagements: memoirs/movies/artworks/writing by subsequent generations (in compliance with copyright regulations);
- Records on the history of institutions documenting the Holocaust, working in Holocaust education and reconciliation (including very early initiatives).

## Endnotes

- 1 The word “Roma” is used in this document as an umbrella term which includes different related groups, whether sedentary or not, such as Roma, Travellers, Gens du voyage, Resandefolket/De resande, Sinti, Camminanti, Manouches, Kalés, Romanichels, Boyash/Rudari, Ashkalis, Égyptiens, Yéniches, Doms, Loms and Abdal that may be diverse in culture and lifestyles. This endnote serves as an explanation, not a definition of Roma.
- 2 “Stockholm Declaration.” IHRA, Jan. 2000, [www.holocaustremembrance.com/about-us/stockholm-declaration](http://www.holocaustremembrance.com/about-us/stockholm-declaration). Accessed 1 February 2022.
- 3 Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), <http://data.europa.eu/eli/reg/2016/679/2016-05-04>. Accessed 1 February 2022.
- 4 “IHRA Working Definition of Holocaust-Related Materials.” IHRA, [www.holocaustremembrance.com/resources/workingdefinitions-charters/working-definition-holocaust-related-materials](http://www.holocaustremembrance.com/resources/workingdefinitions-charters/working-definition-holocaust-related-materials). Accessed 1 February 2022.

This working definition was drafted in 2012 for the purpose of the IHRA’s Archival Access project. It remains a useful and practical tool for the purposes of this document, although there is a need to update the definition, for example because of progress in research, knowledge and technology.



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