

# Response ID ANON-VZHT-9YW7-C

Submitted to Consultation for Scotland's new historic environment strategy  
Submitted on 2023-02-13 19:34:02

## Introduction

1 Do you consent to to our GDPR statement?

Yes I consent to this GDPR statement

Are you responding as an individual or organisation?

2 Are you responding as an individual or on behalf of an organisation?

On behalf of an organisation

3 Please enter the first part of the postcode belonging to you/your organisation, e.g. EH1.

Postcode text box:

RG6

4 Which areas of the historic environment sector is your organisation/ are you involved with? Please select all that apply.

Archaeology

Text box for other:

## About you

5 Which of the following are you responding on behalf of? Please select one option only.

Charity or third sector organisation with a heritage purpose (not for profit)

Text box for other response:

6 Which areas do you or your organisation work in? Please select one. (Please tick not applicable if this question does not apply to you)

International- e.g. you/your organisation are based in and/or operate internationally

7 If you are responding as someone who works in the historic environment sector, what size is the organisation you work for? This includes paid employees and volunteers. (Please tick not applicable if this question does not apply to you)

headcount less than 50

## Demographic questions

8 Please let us know if any of the below apply to you.

9 What is your age?

age in number:

10 How would you describe your race and/ or ethnicity?

How would you describe your race and/ or ethnicity?:

11 What religion, religious denomination or body do you belong to?

Not Answered

If other, please describe here:

12 How do you describe your gender?

Not Answered

If other, please describe here:

13 Which of the following best describes your sexual orientation?

Not Answered

If other, please describe here:

## Our shared mission and principles

14 Our aim is for this strategy to support prioritisation, and to help realise the value of the historic environment. We have drafted the statement below with this in mind. Do you support this mission statement? Please use the text box to explain what you like about it or what you would change. You do not have to choose a response option to comment in the text box.

Yes I support this mission statement.

Text box to explain answer:

Broadly, ClfA supports the mission statement. We agree that work to investigate, manage, and care for the historic environment is done in the interests of the public, through the creation of various public benefits. However, the mission, read in context, does not adequately define the historic environment or describe why it is valued. The idea that the historic environment can be used as a tool to achieve certain outcomes is not objectionable, but we would feel more confident in this mission if the Strategy made it clear that (a) the historic environment is valued by people for what it is, as well as what it does. And (b) that the historic environment creates benefit in many different ways and not only in the three priority areas.

We would support additional qualification, such as 'maximise the potential to create public benefit, while sustainably managing it to ensure that the essential qualities and character that underpin why it matters to people are secured for the benefit of society now and in the future'.

15 These are the six principles that have been identified in feedback from the engagement workshops. Do you agree with them? Please use the text box to explain what you like about them or what you would change. You do not have to choose a response option to comment in the text box.

Priority matrix agree/disagree - We must put people at the heart of this strategy:

Not sure

Priority matrix agree/disagree - We must face the climate and biodiversity crises:

Not sure

Priority matrix agree/disagree - We must care for, and protect, our heritage assets:

Not sure

Priority matrix agree/disagree - We must work collaboratively across sectors:

Not sure

Priority matrix agree/disagree - We must be prepared to make difficult decisions:

Not sure

Priority matrix agree/disagree - We must make inclusive and transparent decisions:

Not sure

Please add any comments on principles here:

While we agree with the principles individually, at present they do not cover key concepts and practice relevant to archaeology. We request that 'we must understand, investigate and record the historic environment' is added as an additional principle. This principle is the basis for what archaeology is and does and was featured prominently in the original 2014 OPIIT. We suggest that this is either added as a separate new principle, or is merged into principle 3 (care and protect). A merged principle 3 might be titled "We must understand and care for our heritage assets"

The explanatory paragraph in the 'Our priorities' section might read;

"Our heritage - whether tangible or intangible, cultural or natural - is the resource that allows us to create benefits and realise our outcomes. We do not protect our historic environment for its own sake, but because of the value that it delivers to our society. We need to understand our heritage, through investigation, recording, and working with communities. We also need to keep assets in good shape - used responsibly and sustainably. We owe it to future generations to leave them assets that they can value, understand, enjoy, and benefit from just as we do today."

Adding this principle will also help to ensure coverage for Scotland's Archaeology Strategy (in particular, Aim 2) - which the consultation proposes adopting as part of the Strategy's delivery.

We also recommend adding a principle relating to Skills. Skills was a key area of discussion within the sector workshops and it is disappointing that it has not made the final Strategy as a priority, especially seeing as it was voted as a top priority in the sector's prioritisation workshop. While specific skills issues relating to the three priorities are included in the KPIs, we believe that a broader principle relating to skills would provide some assurance that the sector's efforts in this area are recognised as important.

A skills principle might be: "We must make effective use of specialist skills and capacity"

A supporting paragraph (which borrows useful language from old OPiT) for p8-9 might say: "A wide range of professionals and specialists work to protect and promote the historic environment. These include surveyors, architects, archaeologists, archivists, museum curators, planners, engineers and craftspeople across many different skills and trades. We must strive to ensure that people can acquire and use the skills that they need or desire to help deliver public benefit, creating accessible careers and improving access for all."

We recognise that it may not be desirable to add more than 6 principles. In this case, we suggest suggestion merging principles 5 (difficult decisions) and 6 (transparent decisions). These are both about institutional values that link to how we should behave in decision-making. ClfA believes that they are sufficiently similar that you could merge them to say; "We must be prepared to make difficult decisions, inclusively and with transparency".

A supporting paragraph might read: "We recognise that limited resources mean we can't do everything, and nor can we commit to sustaining every heritage asset over the long term. Prioritising means emphasising or resourcing some things over others, and we acknowledge that some things might be lost to the future as a result. This strategy will help to make well-informed, transparent, consistent, timely, and proportionate decisions, and to take risks where they can help to find solutions to the challenges we face. Early dialogue and close collaboration are key to ensuring this, as is empowering communities so that they can shape the future of their places. But we also need to recognise that every community is different, and that we need to adapt our work and relationships as a result. If we can do this, we can achieve the outcomes we want to achieve while caring for and protecting our assets, our communities, and our planet."

## Our priorities, outcomes and actions

16 We have identified three key priorities as the focus for delivery over the next five years. Do you agree with them? Please use the text box to explain your answer. You do not have to choose a response option to comment in the text box.

Priorities, do you agree - Enabling the transition to net zero:

Don't know

Priorities, do you agree - Empowering vibrant, resilient, and inclusive communities and places:

Don't know

Priorities, do you agree - Building a wellbeing economy:

Don't know

Please add any comments on priorities here::

We recognise that the three priorities are areas of key national focus for Scotland. It is right that the historic environment looks to target improvements in these areas. However, at present, it is not clear enough that these principles only cover a small fraction of the 'core' work in the historic environment, and represent only three areas through which the historic environment benefits society.

Individually, we agree that these three areas are sensible priorities for the next 5 year. We would, therefore, support a Strategy that focuses on these three challenges provided that the wide variety of other core work that happens in the historic environment sector is recognised, and its contribution recognised, and its continuation will be supported. There are many ways in which the historic environment creates benefits (fulfilling the mission) - including the very core activities associated with managing or investigating heritage assets - which these priorities do not cover.

This needs to be articulated clearly in the preamble to the Priorities section on p10.

We recommend adding the following explanatory text (or similar):

"Scotland's historic environment creates benefit for our society in many ways, from protecting assets that people value, helping us to understand them better by investigating them, making them accessible to communities and tourists, contributing to our economy and enhancing places and the environment. This strategy does not describe all these benefits, rather, it focuses on three key priority areas for action. We will not solve all the challenges under these areas in the life of this five-year strategy, nor will other beneficial activity in other areas cease.

This strategy identifies the short-term outcomes that we'll work to realise during that time. Achieving these outcomes will bring us closer to realising our mission in these key areas, while making a real difference to people's lives in the process."

This text essentially confirms that core sector work, like making HERs more effective, ensuring that we've got the right skills and policies to create benefit through public engagement through development-led archaeology, etc. are recognised.

17 Each priority has a set of outcomes expressed as Key Performance Indicators (KPIs) associated with it. Do you agree with these KPIs? Please use the text box to explain your answer. You do not have to choose a response option to comment in the text box.

I suggest changes to one or more of the KPIs and/or have ideas for additional KPIs

If you have comments on the KPIs, including new or different measures that could be used, please comment below::

We feel that there are several key changes that would be required for us to support the KPIs. These include additions to ensure an appropriate breadth of coverage of historic environment sectors and activities. In particular, the suggestions below mostly focus on making sure that the aims of the Archaeology Strategy are not 'orphaned' outside the Strategy, which would seem illogical given the intention to adopt Scotland's Strategic Archaeology Committee as an Delivery group under the new Strategy.

We recommend the following additions/edits to KPIs and measures:

Priority 2 preamble: Make it clear that professional skills are included by adding appropriate wording in the first paragraph after the bullet points.

KPI4: Amend KPI to “Support organisations that study and care for the historic environment to have the right skills and be more resilient” This pulls wording from the bullet points and makes it clearer that skills are a key part of this KPI. It would help to cover Archaeology Strategy Aim 5 and tie into the Skills Investment Plan.

KPI5: Amend title to “The historic environment is mainstreamed across relevant local, regional and national plans, and communities have a stronger voice in decisions.” The current measure, in our view, should actually be part of the KPI here. It is, helpfully, much broader and helps to ensure that the KPI has relevance to ‘place’, which is currently lacking. The measure can become “Evidence the inclusion of the historic environment placemaking and community voice in local, regional and national plans.”

KPI 8: If interpreted broadly, we support KPI8. However, the measure does not indicate an appropriate level of ambition or understanding of the challenges our sector faces in building attractive, sustainable careers. ClfA recognises that taking action on pay and conditions is vital and we would welcome a Historic Environment Strategy which helped to set ambitious goals in this area, or which added weight to sector bodies’ efforts in this area. However, we are not aware that our sector has a particular problem with zero hour contracts and not paying a Living Wage. As such, this KPI sets the bar too low. It would be more useful if the KPI measure referred to all 5 of the FWF dimensions and framework and the Young Person Guarantee. We would also welcome wording with appropriate breadth so as to be able to cover sector work on improving pay and conditions.

18 Under each KPI, we have set out the actions we might take at national level to deliver our mission. Do you think these actions are the right ones to deliver against the KPI? Can you suggest alternatives?

I suggest changes to one or more of the actions and/or have ideas for additional actions

Text box for alternative actions:

While we have endeavoured in this response to include useful suggestions for additional actions, we believe that it should be made clear that the lists of actions are examples, not an exhaustive list. Because of the multiplicity of actors at a national and local level, it will be impossible to anticipate all possible ways that sector activity could contribute to KPIs. Making it clear that these are only examples serves to ensure that the creativity of the sector is not curtailed.

We suggest the thought is given to broadening actions, where possible to ensure that they can apply to all sectors – or as many as may be relevant – as many unnecessarily focus only on historic buildings at present. We have provided comments separately to HES about where addition of wording relating to ‘investigate and record’ in addition to ‘manage, care for’ etc, could help to include archaeologists.

We also note that in various places it is clear that ‘we’ refers to HES specifically. We wonder whether where this is the case, HES is specified. We also note that the draft avoids using terms like ‘historic environment sector’. While we understand that the impulse may be to be inclusive and use accessible language, there are places where reference to independent national bodies working in the historic environment sector would be helpfully specified.

We note that the Skills Investment Plan is directly references under KPI8. I wonder if this precedent might enable reference the Archaeology Strategy in one or two key ‘Nationally we will’ actions too.

We recommend the following specific additions/edits to KPI national actions:

KPI 1: Add a new ‘nationally we can’ action “Develop training and guidance to help organisations achieve net zero goals” This would enable an organisation like ClfA, or a contracting body, to apply for funding to create toolkits/training for various net zero goals.

KPI4: A ‘nationally we can’ action could be included along the lines of “support skills audits and cross-sectoral partnerships which can provide training, share skills, knowledge and capacity to address identified needs”.

KPI7: Add a reference to improving public benefit outcomes from historic environment management activities. This accords with Archaeology Strategy Aim 3, for example: Nationally we will “ensure that those managing change to the historic environment have access to expert advice and data to maximise potential for public benefit from economic activities”.

KPI9: Add a reference to encouraging greater engagement, in accordance with Archaeology Strategy Aim 4. Specific examples such as the Attainment through Archaeology and/or Adopt-a-Monument which utilise heritage to develop transferrable skills through volunteering (often in low SIMD areas/‘rural’ areas) might sit well alongside Make your Mark. Otherwise just a general descriptor that might catch these scheme’s outcomes.

19 Under each KPI, we have set out the actions we might take at a local (regional) level to deliver our mission. Do you think these actions are the right ones to deliver against the KPI? Can you suggest alternatives?

I suggest changes to one or more of the actions and/or have ideas for additional actions

text box for local delivery comments:

At present the dichotomy between ‘nationally we will’ and ‘locally you can’ appears to imply that ‘local’ audiences do not have the same ownership of the strategy as national audiences. We suspect that this is not the intended message. As stated above, it also implies that national audiences (including independent sector bodies) are obliged to deliver the strategy, but local audiences are not.

It is not clear from the actions that regional partnerships are envisioned as part of delivery solutions, and we would welcome clearer mention of the need to, for example, build partnerships to support social action around heritage projects.

Additionally, as stated above, we would make clear that stated actions are only an example of what can be done in fulfilment of the KPI. In future, case studies exploring innovative actions could be published to inspire further creativity.

20 What structures and mechanisms are needed to oversee successful delivery of the new historic environment strategy?

Text box to explain answer:

We welcome the adoption of Scotland's Strategic Archaeology Committee (SSAC) as a delivery body under the Historic Environment Strategy. SSAC has demonstrated an effective track record for delivery of Scotland's Archaeology Strategy since its inception and has always informally reflected and worked towards OPiT outcomes. We would commend SSAC as a model for effective oversight of delivery on the new Strategy. We suspect that there will not be a one size fits all solution for whether the most appropriate working groups are structured around Priorities or specific sector areas. However, for archaeology, we would favour SSAC as a proven body able to coordinate actions from the archaeology sector towards new Strategy Aims.

We consider that one clear reason why SSAC has been an effective working group is that it has benefitted from resources to ensure effective facilitation. In ClfA's experience, working groups which are facilitated by staff with dedicated responsibility tend to be far more effective.

We would also welcome further information explaining how the Strategy will approach the systematic collection of data to support measurement of KPI delivery.

21 Participants attending the engagement workshops asked for regional opportunities and mechanisms to help deliver the strategy. Do you have suggestions for how a regional approach to delivery might work?

Text box for regional deliver mechanisms:

22 If applicable, what role would you like to have in delivering the strategy? An example of a role could be taking part in a steering group overseeing delivery of the strategy or taking part in a working group that delivers to a particular priority.

role in delivering the strategy:

As the leading body delivering professional accreditation and improving standards in the field of archaeology, across the UK and overseas, ClfA expects to contribute towards the achievement of positive outcomes from its work in Scotland, ultimately benefiting the public. The vast majority of ClfA's work programmes over the past decade have been linked to OPiT's desired outcomes, whether on professional practice development, improving standards and guidance, skills and training provision, or advocacy relating to relevant government policy. As stated above, much of this work – which is driven by our strategic plan – will continue over the next 5 years.

We will continue to look for ways to meet Scotland's Historic Environment Strategy aims and contribute toward KPIs. However, we also continue to work on things which were recognised in the original OPiT, but which are no longer 'priorities' in the revised draft. Some of this work is likely to require funding applications to HES to support. We hope that there will remain certain scope to support such work under the new Strategy.

ClfA staff members have participated in several OPiT working groups since 2014, and we are a key delivery partner on Scotland's Archaeology Strategy, delivering Aim 5 of the strategy and having had a presence on Scotland's Strategic Archaeology Committee (SSAC) from its inception. ClfA would welcome roles on appropriate delivery/steering groups under the new Strategy, including if SSAC is adopted formally as an OPiT delivery body.

ClfA's CEO has not been invited to join the OPiT 'CEO's Forum' in the past. This appears to have been a result of only exclusively Scottish bodies being invited. We suggest that this limitation is probably not necessary, and could helpfully be expanded to include bodies with a UK-wide remit like ClfA. We would welcome the opportunity to engage with other bodies at this level through which we would be able to contribute to independent advice on Strategy delivery.

## Impact Assessments

23 What impact do you think the strategy might have on people with protected characteristics? Please add any comments in the text box below.

Impact on protected characteristics - Age:

Positive impact

Impact on protected characteristics - Sex:

Positive impact

Impact on protected characteristics - Sexual orientation:

Positive impact

Impact on protected characteristics - Gender reassignment:

Positive impact

Impact on protected characteristics - Disability and long-term conditions:

Positive impact

Impact on protected characteristics - Race:

Positive impact

Impact on protected characteristics - Pregnancy and maternity:

Positive impact

Impact on protected characteristics - Marriage and civil partnerships:

Positive impact

How will this effect EDI text box:

24 What impact do you think the strategy might have on the competitiveness of Scottish businesses, the third sector or the regulatory context? Please add any comments in the text box below.

Negative impact

Text box will this impact businesses or 3rd sector:

We imagine that there could be some negative impacts from a narrowly focused strategy, if care is not taken to ensure wider recognition of work being undertaken in the historic environment. The narrowing of the priorities to three has the potential to discourage applications for funding for activities not clearly covered by the Priorities, even though they may be critical to sector organisations.

There is also a potential that HES funding for activities in support of the Priorities has the effect of duplicating grants that could be available from other funding sources (for example specific net-zero funds). This could have the effect of reducing the spread of third sector funding applications and therefore meaning less money available for issues specific to heritage protection, conservation, or investigation, which are less likely to be able to funded from other sources.

We do not think these risks are considered in adequate detail in the BRIA.

25 What impact do you think the strategy might have on people in island communities? Please add any comments in the text box below.

Not Answered

Text box to describe impact on island communities:

26a Has our environmental assessment identified the likely environmental effects of the options?

Not Answered

26b Do you think there are any additional environmental mitigation, enhancement, or monitoring measures that should be considered?

Not Answered

26c Do you have any other comments on the environmental assessment? If so please comment below.

Text box for other environmental assessment comments:

Final comments and follow ups

27 Do you have any final comments on the draft strategy?

final comments text box:

We have noted elsewhere that references or small wording tweaks to the draft would be useful in various places to ensure that archaeology is adequately included in places where it is relevant to do so. Rather than list specific textual changes (which have been provided separately), below are noted general ways in which this can be done:

- Ensure that statistics reflect the development-led archaeology sector, for example in referring to the contribution to Scotland's economy.
- Ensure that the text includes references to 'understanding the historic environment', 'investigating and understanding assets' etc, in addition to things like 'managing and protecting assets'.
- Mention undesignated heritage assets, where appropriate – over 90% of known heritage assets with archaeological interest are undesignated.

28 Do you want us to follow up with you about this consultation? If yes, please include your email address. We will only use it for the purposes of contacting you about this consultation and any relevant follow up activities.

Yes, I am happy to be contacted in future about this consultation

Email address for consultation follow up:

rob.lennox@archaeologists.net

29 Would you be interested in taking part in a survey that seeks to understand the impact of the cost crisis for the historic environment sector? If so, please provide your email address.

Yes

Email address for cost crisis survey:  
rob.lennox@archaeologists.net