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Dear Dr Brown,

Consultation on Scotland's Archaeology Strategy¹

Thank you for the opportunity to comment on the draft Archaeology Strategy for Scotland.

The Chartered Institute for Archaeologists

The Chartered Institute for Archaeologists (ClfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

ClfA has over 3,250 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

This response has been drafted with the assistance of ClfA's Scottish Group which has over 250 members practising in the public, private and voluntary sector in Scotland. Furthermore, ClfA is a member of the Built Environment Forum Scotland (BEFS), a network organisation that brings together non-governmental organisations and professional bodies that work with Scotland's built environment.

Scotland's Draft Archaeology Strategy

General

ClfA welcomes and strongly supports the publication of a ten-year strategic plan to contribute to the delivery of archaeological aspects of Scotland's Historic Environment Strategy, *Our Place in Time* and of the National Strategy for Scotland's Museums and Galleries.

The Institute particularly welcomes

- the recognition, both inside and outside Scottish Government, of the need for a clearly-stated, strategic approach both to the historic environment and to archaeology
- the publication of a draft Strategy which seeks to be bold and ambitious and to complement the vision of *Our Place in Time*
- the recognition in the draft Strategy of archaeology's contribution to wellbeing in addition to its other contributions (including the central one of enhancing our understanding of the past)
- the emphasis in the draft Strategy upon the need for ethics and professional standards in the conduct of archaeological activities
- the support in the draft Strategy for the use of expert advice, underpinned by professionally-managed Historic Environment Records and other services.

Detailed concerns with the content of the draft Strategy are addressed in the answers to specific questions, but such concerns should not in any way undermine ClfA's general support for the Strategy.

Specific Questions

Q1. Does the vision (p. 4) take account of your aspirations for archaeology in Scotland? What is your vision for Scottish archaeology?

1.1 Yes, although the supporting text (*'archaeology is about everything ...'*), while simple and bold, may be over-ambitious and detract from the vision rather than strengthen it.

Q2. Are the strategic priorities (p. 7-19) appropriate? What different approaches would you suggest and why?

2.1 Yes. The suggested priorities correlate with the priorities established in *Our Place in Time* and it might be helpful to identify that correlation (perhaps graphically) in the Strategy.

Q3. The Strategy proposes a review of funding structures for Scottish archaeology (p. 19). Do you agree that this is needed and is there anything in particular that you would like to see such a review address?

3.1 Yes. Such a review should be wide-ranging and not rule out of consideration any reasonable alternatives.

Q4. Engagement with archaeology.

(i) Does this Strategy look as though it will make it easier for you to engage with archaeology?

4.1 Possibly, for instance, through increased partnership working. We would welcome stronger strategic partnerships with Historic Environment Scotland and other stakeholders.

(ii) How would you like to be involved in archaeology over the next ten years?

4.2 As a professional body 'setting standards for the study and care of the historic environment'. The draft Strategy and ClfA's own Strategic Plan (<http://www.archaeologists.net/sites/default/files/node-files/Stratplansummary.pdf>) are consistent and complementary and we believe that the Institute has a crucial role to play in the delivery of Scotland's Archaeology Strategy.

(iii) What barriers exist now and what would help greater inclusion and should be included in this Strategy?

4.3. The Strategy emphasizes the need to engage commissioning bodies and developers with the wider potential for their archaeological projects. There is currently no coherent model that the wider archaeological community can use to promote this holistic potential. It is hoped that the Strategy will provide this coherent model for collective use and promotion.

4.4 The lack of resource in local authorities and other public bodies provides a major barrier to the engagement of communities and the public generally which, in itself, fosters inclusion. Consequently, it is important for the Strategy to support the continuing outreach and related roles currently provided by local authority archaeology services and other public bodies.

4.5 Attitudes to professionalism, ethics and accreditation, accompanied to some extent by a lack of cohesion in the sector, also potentially undermine wider engagement with the Strategy. Further work to address these issues should be supported by Scottish Government.

Q5. I. Encouraging Greater Engagement (p. 7-8).

Does this aim reflect your ambition for Scottish archaeology?

5.1 In part, yes. ClfA applauds the emphasis on contributing to the nation's wellbeing in the Key Aim and recognises its importance. Nevertheless, increasing wellbeing is not the only outcome to be achieved by encouraging greater engagement. For instance, greater engagement, both within the archaeological sector itself and outside it, would potentially lead to greater understanding and better care and protection of the historic environment.

5.2 This may be covered in the Objectives (for example, '*To encourage creative, collaborative working*') and in the action points. However, the Key Aim and supporting text appear largely to be addressed to the public and communities. This, in itself, is wholly appropriate, but it would be helpful if it were counter-balanced by further references to other audiences (such as Government, the development world, museums and the commercial and academic community in archaeology) where greater engagement might also bear fruit. The natural environment sector is identified in the fourth bulleted action point, but this is not the only area where working groups might facilitate better engagement and collaboration.

Do you agree with the priorities assigned to the Objectives?

5.3 Yes, subject to the comments in paragraphs 5.1 and 5.2 above.

Do these suggested actions provide a reasonable basis to begin to take the Strategy forward?

5.4 Yes, subject to the comments in paragraph 5.2.

Q6. II. Enhancing Understanding (p. 9-10).

Does this aim reflect your ambition for Scottish Archaeology?

6.1 Yes. The references to improving *'ethics, standards and guidance in the conduct of archaeological activities'* and compliance with ClfA Standards and guidance are particularly welcome.

Do you agree with the priorities assigned to the Objectives?

6.2 Yes.

Do these suggested actions provide a reasonable basis to begin to take the Strategy forward?

6.3 Yes, save that

- when the draft Strategy states that “all archaeological activities should be compliant with the relevant Standards and Guidance, for example those promoted by the Chartered Institute for Archaeologists (ClfA) and others” it would be useful to define the ‘others’ in order to clarify the Strategy’s position.
- the reference to *'Utilis[ing] good practice promotion'* in the third line of page 10 might better be phrased *'Promote good practice'*
- ClfA would like to see the actions more clearly supporting the use of accreditation (which the Institute sees as a key means to improve professional ethics and standards). As well as *'Ensuring equality of opportunity for all to seek professional accreditation'* the Strategy should, for instance, *'encourage all to apply to be accredited'* and *'make use of accredited status as a way of managing quality and delivering public benefit'*.

6.4 We strongly support the creation of a Professional practice and ethics working group and suggest that ClfA is ideally placed to lead on this, perhaps via the current grant to ClfA.

Q7. III. Caring and Protecting (p. 11-12).

Does this aim reflect your ambition for Scottish Archaeology?

7.1 Yes.

Do you agree with the priorities assigned to the Objectives?

7.2 Yes. ClfA strongly supports these objectives.

7.3 The positive approach in seeking to identify incentives to encourage sustainable management is appropriate, but does not remove the need for disincentives that discourage unsustainable management or other damage to the historic environment. This should be addressed in this section.

Do these suggested actions provide a reasonable basis to begin to take the Strategy forward?

7.4 Yes, save that it is not clear upon whom the onus rests to provide a properly resourced [my underlining] approach to chance discoveries and archaeological emergencies. (See below for further comments on the responsibility for delivering the Strategy).

7.5 Objective c also raises interesting issues regarding the potential friction between research agendas and good Project Designs (promoted by the Strategy) and the approach defined by the Scottish Historic Environment Policy (which is not mentioned or discussed by the Strategy). (see below).

Q8. IV. Celebrating (p. 13-14).

Does this aim reflect your ambition for Scottish Archaeology?

8.1 Yes.

Do you agree with the priorities assigned to the Objectives?

8.2 Yes.

8.3 Objective a. (*'To find **new ways** of using the understanding and management of our archaeological knowledge to contribute to the cultural, environmental, economic and social life of Scotland'*) is one which ClfA very much endorses. To highlight the breadth of this objective it might be helpful clearly to state that archaeological knowledge is an important community resource in its own right (mirroring the words in *Our Place in Time* which highlights the need increasingly to *'value the historic environment as ... an important community resource in its own right'*). This would reinforce the view expressed by Fiona Hyslop, Scottish Government's Cabinet Secretary for Culture and External Affairs, in a speech to BEFS on 13 June 2013: *'The heritage sector does not need to make a new economic case to justify public support for its work'*.

8.4 The development of conservation principles for Scotland may also help in this regard. The publication of conservation principles in both England and Wales has proved very useful in providing a clear basis and values to underpin planning and other policy.

Do these suggested actions provide a reasonable basis to begin to take the Strategy forward?

8.5 Yes. However, the third bullet perhaps promises more than it can deliver unless there is confidence that the development sector is willing to support and underwrite the cost of bursaries. That is not an unreasonable expectation, especially in the context of apprenticeships on large public-sector infrastructure projects, but it is not guaranteed.

Q9. V. Improving Skills (p. 15-16).

Does this aim reflect your ambition for Scottish Archaeology?

9.1 Yes, although the key aim, itself, might make clear that the archaeological skills which people need are those required for the care and protection of the historic environment, enhancing knowledge and other archaeological objectives.

Do you agree with the priorities assigned to the Objectives?

9.2 Yes.

Do these suggested actions provide a reasonable basis to begin to take the Strategy forward?

9.3 Yes.

9.4 ClfA is ideally placed

- to lead on supporting “greater understanding of accredited skills and competence by clients and employers...”, perhaps via the current HES grant to ClfA
- to support further skills development, generally. The model of support demonstrated by the very successful HLF Skills for the Future funding programme could be replicated if resources were available (whether from HLF or elsewhere).

Q10. VI. Innovating (p. 17-18).

Does this aim reflect your ambition for Scottish Archaeology?

10.1 Yes.

Do you agree with the priorities assigned to the Objectives?

10.2 Yes, although ClfA would like to see these objectives more overtly linked to the need for further professionalisation of the sector.

Do these suggested actions provide a reasonable basis to begin to take the Strategy forward?

10.3 Yes.

Q11. VII. Improving Archaeological Projects (p. 19).

Does this aim reflect your ambition for Scottish Archaeology?

11.1 Yes, although ClfA would wish to see this aim expanded to include ensuring that projects are designed and executed in accordance with standards by accredited practitioners. The recognition of funding as a central issue is a key element of the strategy.

Do you agree with the priorities assigned to the Objectives?

11.2 Yes, although ‘ensur[ing] that all archaeological projects are properly resourced...’ (which includes having appropriately skilled personnel as well as funding) may, as an objective,

promise more than it can deliver as regards funding, particularly when it is not clear who will be responsible for delivery (see below).

Do these suggested actions provide a reasonable basis to begin to take the Strategy forward?

11.3 Yes.

11.4 The final actions on page 19 have an international dimension in line with the desire ‘*to situate our archaeological activities within the wider world and pursue an internationalisation agenda.*’ This, however, is the only strategic priority where international issues are addressed and consideration might be given to addressing such issues elsewhere in the draft Strategy. The Strategy should also emphasise the need to engage within the **wider UK and international agenda.**

Q12. Delivering Scotland’s Archaeology Strategy.

(i) Do you agree with the proposals for leading on the delivery of the Strategy (p. 20)?

12.1 Insofar as they go, yes. However, responsibility for delivery of the Strategy is not clearly identified in the draft Strategy. Delivery of the Strategy will be ‘led’ by SSAC (page 20), but, although numerous activities are identified, responsibility for carrying out those activities and delivering aims and objectives rests, it seems, with ‘*archaeologists and heritage managers*’ (page 6). It is envisaged that there will be working groups, action plans and implementation plans (all of which are welcomed), but consideration should be given, even at this high level, as to who precisely will be responsible for delivery. There is a risk that if everyone is responsible for delivery, in practice no-one will be responsible. Nevertheless, it is recognised that the Strategy defines a framework for the whole archaeological community to engage with, promote and deliver. The Strategy could perhaps better define the holistic nature of the ‘archaeological community’.

12.2 Working groups are key tools for delivery and ClfA remains keen to be fully involved in such groups wherever possible. Nonetheless, if care is not taken, working groups can simply perpetuate a situation where decisions are made and activities undertaken by a relatively small group of ‘usual suspects’. These groups must engage effectively with a wider audience.

12.3 Consideration also needs to be given at the outset to how delivery will be measured. It is appreciated that action plans and implementation plans should provide further detail, but a clear commitment to monitoring and measurement of progress would be welcome at this stage. For instance, wider reference might be made to the Measuring Success framework of *Our Place in Time* (see the final bullet point of page 7).

(ii) Would you be willing to use this Strategy and, if so, how will you use it?

12.4 Yes. ClfA would seek to integrate the Strategy into its own strategic planning. The Strategy would help us to focus and prioritise our own strategic objectives (<http://www.archaeologists.net/sites/default/files/node-files/Stratplansummary.pdf>) in Scotland. It would also provide ClfA with an alternative, and nationally relevant, framework for reporting.

(iii) How would you like to see this Strategy taken forward? Would you like to be involved? In which case, how and where?

12.5 ClfA would like to see the Strategy taken forward with the full backing of Scottish Government, meaningful 'buy-in' of the wider archaeological sector and the informed support of the public and others outside the sector.

12.6 ClfA hopes further to be involved in the formulation of the Strategy, in its promotion (both inside and outside the sector) and in its implementation (through participation in the activities of working groups, training and other projects).

Q.13. If you could nominate one critical issue that needs to be addressed or an idea that you feel would significantly improve archaeology and the public's understanding and engagement with it, what would it be and why?

13.1 Ensuring support for the services provided by local authority archaeological services and assuring the quality of archaeological work through effective regulation.

13.2 In addition, there is clearly potential for friction between the historic environment planning frameworks outlined by Scottish planning policy and the Scottish Historic Environment Policy (particularly with regard to properly planned research projects involving designated historic assets) and the research opportunities and archaeological potential described by the Strategy. Project Designs that promote the benefits and strategic priorities outlined within the Strategy are to be welcomed and encouraged, but there may be tension between research agendas and curatorial responsibilities. SHEP is not currently mentioned within the Strategy.

Q.14. Do you think that the proposals in this Strategy will increase or reduce costs for businesses, the third sector (e.g. charities) or public sector organisations?

14.1 There may be some increase in costs in the short term to enable stakeholders (such as ClfA) to seize the opportunities which the Strategy would offer. Nonetheless, if the Strategy is successful, it should on balance reduce costs in the long run by facilitating sustainable development, promoting wellbeing and focusing activity and encouraging cooperation and partnership-working in the archaeological sector.

Q.15. Will any of the proposals impact differently on any equality groups? Are there any key issues or opportunities we should consider to make sure that the strategy works for different equality groups?

15.1 No comment, save that we note the intentions of the draft Strategy to be inclusive and even-handed.

Q.16. Please use this section to provide any other comments you think are relevant to the Strategy.

16.1 Further to the comments in paragraph 12.1 above, we feel that section one on audiences may need some further consideration with a view to embracing a wider selection of

archaeological stakeholders. For example, rural land managers are well placed to deliver some of the strategic priorities yet are not specifically identified.

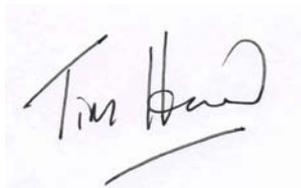
16.2 Furthermore, the draft Strategy uses the word 'we' in a number of places, but it is not always clear to whom the Strategy is referring. Further clarity in this regard might help to address the concern that where everyone is responsible, in practice no-one is responsible.

16.3 We also note that the Strategy needs an enthusiastic response from its audience(s) to be successful. To succeed in its aim (to make archaeology matter) it needs to engage and inspire its audience. We feel that the introduction to the Strategy (and any headline summaries) must be written in an enthusiastic, passionate and upbeat style.

16.4 ClfA looks forward to working with the Scottish Strategic Archaeology Committee to finalise and implement a bold and ambitious strategy for archaeology in Scotland.

In the meantime, if there is anything further that I can do to assist, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch
Senior Policy Advisor

¹<http://www.historic-scotland.gov.uk/archaeology-strategy-consultation.pdf>