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28 June 2013

Dear Bruce,

Consultation on Scotland's Historic Environment Data Strategy

Thank you for the opportunity to comment on this draft Strategy.

The Institute for Archaeologists

The Institute for Archaeologists (IfA) 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.

IfA has over 3,000 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.

IfA's Scottish Group has over 200 members practising in the public, private and voluntary sector in Scotland. Furthermore, IfA 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.

IfA has had input into the process through attendance of Scottish Group representatives at workshops, and we are confident that we have captured the views of the IfA Scottish Group. Unfortunately we have not had the opportunity to consult with our Information Management Special Interest Group. It is likely that those working on the Strategy have liaised with the relevant professional group, but if not we would be pleased to ask IMSIG for its comments, albeit after the deadline.

Scotland's Historic Environment Data Strategy

IfA strongly supports this important resource and the development of a Strategy to guide its development and use.

While the Institute generally endorses the aims and objectives of the draft Strategy (subject to the comments below), we are disappointed by the lack of consideration of professional standards in addition to data standards, and the failure to address the role of professional accreditation in

demonstrating and ensuring that those standards are maintained.

IfA also recognises the challenge in practice of delivering its commendable aspirations, particularly in such financially challenging times. One specific and achievable objective which might assist in this regard would be for the Strategy to seek a statutory duty for planning authorities to have access to a professionally supported and maintained Historic Environment Record. This issue is addressed further in the responses to specific questions below.

Our overall view of the strategy, therefore, is that it is good as far as it goes, but that that it may fail unless it is expanded to encompass professional and statutory mechanisms to ensure delivery to professional standards. We urge reconsideration of these matters to avoid the Strategy turning out to be an opportunity lost.

1. Do you agree with the Scope of the Strategy as stated within Section 2.5 – 2.8?

Broadly, yes; but it is important to recognise that it is not a strategy for all historic environment data, only those datasets specified in 3.5.

2. Do you feel that your interest or viewpoint is fairly represented within the Strategy as a whole?

Generally, yes, and we welcome the emphasis on professional standards (which might be supplemented by reference to relevant IfA Standards and guidance). However, the draft Strategy fails adequately to deal with issues relating to museums and museum collections.

3. Do you agree with the principles that underpin the Strategy (Section 6.3)?

6.1 and 6.3 should make reference to the IfA/ALGAO *Standard and guidance for archaeological advice by historic environment services* ([http://www.archaeologists.net/sites/default/files/node-files/Standard and guidance for archaeological advice interim approved.pdf](http://www.archaeologists.net/sites/default/files/node-files/Standard%20and%20guidance%20for%20archaeological%20advice%20interim%20approved.pdf)). Services should be expected to comply with this Standard and should be encouraged to seek Registration.

4. Do you agree with the aims that underpin the Strategy (Section 6.4)?

Only as far as they go. The strategy is deficient in two ways.

- First, the aims should more directly address the crucial importance of maintaining and, where necessary, improving professional support for the data which is available. In many respects, the effectiveness of SHED will depend upon the expertise which is available to maintain and interpret the data and to advise the public and other stakeholders in relation thereto. Although the Vision does identify the need for the resource to be 'professionally managed' and 'continually updated', this important aspect should be more clearly elaborated in the aims.
- Secondly, the strategy fails to address the desirability of ensuring that services that manage historic environment data and offer advice based upon it comply with the IfA/ALGAO *Standard and guidance for archaeological advice by historic environment services*, of encouraging them to seek IfA Registration.

5. Do you agree with the objectives that underpin the Strategy (Section 6.5)?

In the light of the above comments, IfA would like to see included in the objectives the introduction of a statutory duty for planning authorities to have access to a professionally supported and maintained Historic Environment Record, and an objective of accredited compliance with relevant professional standards.

6. Do you agree with the benefits that derive from the strategy (Section 7)?

Yes, but in addition to private-sector developers and landowners, mentioned in 7.3, reference should also be made to public-sector developers and landowners.

7. Do you have any other comments, additions or corrections to make with regard to the Strategy?

IfA *Standards and guidance* are missing from bibliography: indeed there is no mention of IfA anywhere in the document.

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 'P. Hinton', written in a cursive style.

Peter Hinton BA MIfA FSA FRSA FIAM
Chief Executive, Institute for Archaeologists