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Room 2.6
Historic Environment Scotland
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Edinburgh
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Dear Mr Jackson,

Consultation on Historic Environment Scotland's 2016-19 Corporate Plan¹

Thank you for the opportunity to comment on this draft Corporate Plan.

The Chartered Institute for Archaeologists

The Chartered Institute for Archaeologists (ClfA) is the leading professional body representing archaeologists working in the UK and overseas. We promote high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provide a self-regulatory quality assurance framework for the sector and those it serves.

ClfA has over 3,200 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.

ClfA's Scottish Group 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.

Historic Environment Scotland's 2016-19 Corporate Plan

General

The Institute supported the merger of Historic Scotland with the Royal Commission on the Ancient and Historical Monuments of Scotland on the understanding that the functions of both organisations would be maintained, and welcomed² the intention that these functions should be *'permissive and enabling ...'* allowing *'... the organisation to act as an enabler, supporting*

the contribution of others, in addition to the individual areas of activity it undertakes³. The Historic Environment Scotland Act 2014 respects that understanding and provides a vehicle for the Historic Environment Scotland (HES) to realise its potential.

CIfA welcomes the publication of Historic Environment Scotland's draft Corporate Plan 2016-2019 as an important practical step in realising that potential. In particular, we welcome

- a plan which is grounded in *Our Place in Time* (although this should not be the limit of Historic Environment Scotland's ambition)
- a plan which identifies enabling and collaborating as important aspects of HES's role
- a plan which underpins grant-giving for the benefit of the historic environment

CIfA's detailed concerns (which should not be taken to detract from its general support for the Corporate Plan) are set out in its answers to the specific questions but include

- a failure adequately to address professionalism and its importance for the historic environment
- a lack of clarity in places about HES's role in leading and enabling, creating a tone in which championing and collaboration are promoted and 'command and control' are discouraged
- a failure at times to look beyond HES's narrow interests (for instance, its own property portfolio) and to focus on the wider needs of the sector
- insufficient consideration of HES's role in relation to communities (in addition to 'third parties')
- insufficient consideration of HES's role in relation to local government and planning with clearer support needed for local authorities
- insufficient consideration of HES's regulatory role
- insufficient attention given to skills and capacity building in the sector (as opposed to HES's own staff)

Question 1: Do you agree with our mission statement (p. 6) for HES?

1.1 **Agree**, save that the second bullet point should make clear that the 'it' which is to be protected and conserved is the historic environment.

1.2 We appreciate that the reference to 'the intangible' derives from *Our Place in Time* (page 2), but care needs to be taken not to treat the historic environment and cultural heritage as synonymous. *Our Place in Time* suggests that '*the historic environment could be said to be 'the cultural heritage of places*' [my underlining], but cultural heritage in itself is a wider concept.

1.3 Furthermore, the definition of the historic environment at pages 3-4 of the draft Plan ignores ecofacts and other environmental evidence. There is increasing recognition of such evidence as an important part of the historic environment. Thus, for instance, the draft archaeology strategy for Ireland (Archaeology 2025) defines archaeology as the '*study of past societies through an examination of the material remains left by those societies and the evidence of their environment*' [my underlining].

Question 2: Do you agree with our vision (p. 9) for HES?

2.1 **Agree**, save that we would prefer to see the vision relate to Scotland's 'historic environment' rather than its 'heritage', which would be consistent with the 2014 Act.

Question 3: Do you agree with values (p. 9) for HES?

3.1 **Agree**, save that the organisational value relating to professionalism should be revised. Striving for excellence in everything we do is a catchy sound bite but it lacks proportionality. The requirement should be to meet professional standards. (See also the comments on professionalism at paragraph 12.1 below.)

Question 4: To what extent do you agree that the outcomes (p. 10, p. 12- 18) are the right outcomes for HES?

4.1 **Strongly agree** with each of the 5 outcomes identified in the Plan.

Question 5: Do you have any suggestions for amendments to the outcomes? Is there anything missing?

5. No, save that it would be helpful if the identified outcomes were embedded throughout the document.

Question 6: Do you have any comments on the objectives (p. 10, p. 12- 18) we have assigned to the outcomes? Is there anything missing?

Table on page 10

6.1 The last bullet point under '*Lead - Lead and Enable*' should identify HES as the 'lead public body'.

6.2 The bullet points under '*Understand – Investigate & Record*' are drafted as if HES is the only body engaged in this activity which is not correct. This contrasts with the bullet points under '*Protect – Protect & Care*' which strike a much more collaborative note.

6.3 The final bullet point under '*Perform*' ('*address the impact of climate change*') is admirable but over-ambitious.

Pages 12 to 18

6.4 Under objective 1b on page 12 (expert advice and guidance), the reference to 'developing and promoting standards' does not recognise the need to work with other bodies involved in the setting and promotion of standards. For instance, professional standards (which are produced by professional bodies such as ClfA⁴) should be recognised here and HES should be seeking to endorse such standards and work with professional bodies to promote them.

6.5 Furthermore, the Plan should make explicit the need for HES staff to obtain and keep up-to-date relevant professional accreditation (such as that provided by membership of CIFA) and and for HES to commit explicitly to extending the current ClfA Registered Organisation status of the Royal Commission to the whole organisation.

6.6 Under objective 1e (leading by example, demonstrating high standards) on pages 12 to 13, the reference to 'sharing with and learning from the expertise of others' might be elaborated upon to make clear the need for HES to collaborate with professional bodies and others in order to demonstrate high standards.

6.7 Reference should also be made with regard to this objective to HES's role in delivering Scotland's Archaeology Strategy and the Scottish Historic Environment Data Strategy.

6.8 Under objective 1Ia on page 14, the reference to '*maintaining our status as an Independent Research Organisation*' should be expanded to include 'maintaining and extending our status as a ClfA Registered Organisation'.

6.9 Under objective 1IIa on page 15, the reference to '*leading the development of best practice*' should recognise that the development of best practice is the prime responsibility of professional bodies and should seek to work with those bodies to that end.

6.10 Under objective 1IIc on page 15, the publication of guidance should be undertaken in collaboration with other stakeholders.

Question 7: Do you have any comments on the measures of success (Annex, p. 24-26) that we have assigned to the outcomes?

7.1 Under KPI1 on page 24, it would be helpful to gauge changes of attitude amongst stakeholders and the public brought about by HES's championing of the historic environment.

7.2 Under KPI4 on page 24, the organisation's fitness for purpose can be measured in part by its organisational accreditation under such schemes as ClfA's Registered Organisations scheme.

7.3 Under KPI5 on page 25, the measurements cited may need to be modified in the light of ongoing work on the implementation of Scotland's Archaeology Strategy, but could include information as regards the number of funded projects successfully disseminating information on the historic environment.

7.4 Under KPI6 on page 25, measuring a reduction in the percentage of A-list buildings at risk, by itself, is not a reliable indicator for the historic environment generally and, in any event, is at best a crude indicator (demolishing a number of A-list buildings at risk would perversely indicate an improvement).

7.5 KPI6 should include some measure of the provision local authority services (including Historic Environment Records) given the key role that an increasingly under threat local government plays in managing and protecting the historic environment. Moreover, securing Museum Accreditation and Archive Accreditation should be accompanied by maintaining and extending registration as a ClfA Registered Organisation.

7.6 Under KPI7 on page 25, the measurements all appear to relate to HES properties and do not embrace the wider historic environment.

7.7 Under KPI9 on page 26, the measurements should include skills audits.

Question 8: Do you think any of the objectives in the Corporate Plan will impact differently on people who share protected characteristics? (for example, in relation to their age, disability, gender, pregnancy/maternity, marital status, gender identity, sexual orientation, race, religion or belief). (please see the draft Equalities Impact Assessment)

8.1 No.

Question 9: Are there any key issues or opportunities we should consider to make sure that the Corporate Plan works for different equality groups? (please see the draft Equalities Impact Assessment)

9.1 No.

Question 10: Do you agree with the results of the environmental assessment (please see the draft Environmental Report) and have the key issues associated with the environmental implications of the draft plan been identified?

10.1 No comment.

Question 11: Are there any key areas relating to HES's impact on our stakeholder's interests that should be considered in our Plan?

11.1 None other than those identified above.

Question 12: Please use this section to provide any other comments you think are relevant to the Corporate Plan.

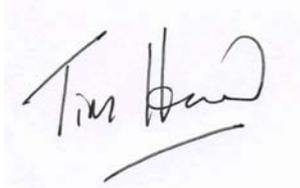
12.1 As one of HES's five organisational values (as set out in section 3.2 of the draft Plan) is that HES is professional, the lack of clear planning for maintaining or expanding professionalism in HES is surprising, and should be addressed. The Plan should make clear what professionalism is and this should be consistent with the definition of 'profession' set out in ClfA's Strategic Plan⁵:

'Professions are disciplines whose members, whether paid or voluntary, agree to be bound by an ethical code, have demonstrated necessary technical and ethical competence, and are subject to the oversight of their peers.'

12.2 ClfA would also like to see some commitment in the Plan to a continuation of the regional operations carried out by its predecessors.

ClfA would be happy further to contribute to the formulation and implementation of the HES Corporate Plan and remains firmly supportive of HES in its key role in relation to the historic environment. In the meantime, if there is anything further that I can do to assist please do not hesitate to contact me.

Yours sincerely,



Tim Howard LLB, Dip Prof Arch
Senior Policy Advisor

¹ <http://www.historic-scotland.gov.uk/consultation-draft-corporate-plan.pdf>

² See the Institute's response to the Joint Consultation on the Historic Environment Strategy for Scotland and the Merger of Historic Scotland and the Royal Commission on the Ancient and Historical Monuments of Scotland dated 31 July 2013: <http://www.archaeologists.net/sites/default/files/2013.07-IfA-response-to-HES-for-Scotland-and-merger.pdf>

³ See pages 33-34 of the Outline Business Case supporting the consultation

⁴ <http://www.archaeologists.net/codes/ifa>

⁵ <http://www.archaeologists.net/sites/default/files/Stratplansummary.pdf>