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09 November 2015

Dear Derek,

Consultation on a draft Standard for Pottery Analysis in Archaeology

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

The Chartered Institute for Archaeologists

The Chartered Institute for Archaeologists (CIfA) 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.

CIfA has over 3,350 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 compiled with the assistance of CIfA's Finds Group which advises CIfA on finds related issues.

A draft Standard for Pottery Analysis in Archaeology

1. CIfA strongly supports this project and welcomes the publication of this draft Standard. However, it is felt that the draft needs to be revisited in order to remove instances of repetition and contradiction in the text. An annotated copy of the draft accompanies this letter containing detailed comments from CIfA's Finds Group Committee.

2. In general, we would comment as follows:

(1) The status of the proposed Standard is not wholly clear. It is suggested in paragraph 1.5 that the intention is that it will be binding on all projects but it is not clear how this will be enforced.

(2) We would like to see more explicit reference to existing standards (which probably contain the definitions used in the commissions of most pottery work at present) and, in particular, ClfA Standards and guidance. Furthermore, the terminology used could usefully align more closely with that of ClfA Standards and guidance. It would be helpful at the outset to refer to the ClfA Standard and guidance for the collection, documentation, conservation and research of archaeological materials (2014) (http://www.archaeologists.net/sites/default/files/ClfAS&GFinds_1.pdf) explaining that the draft constitutes more detailed practice guidance which sits underneath the ClfA document.

(3) The draft contains discussion of archiving but reference is not made to the ClfA Standard and guidance for the creation, compilation, transfer and deposition of archaeological archives (2014) (http://www.archaeologists.net/sites/default/files/ClfAS&GArchives_2.pdf).

(4) The draft should refer to MoRPHE rather than MAP2.

(5) A flowchart outlining ideal project stages and specialist input at each stage would be useful.

(6) The intention to define a pottery specialist is welcome, but it is felt that the definition could be tighter, perhaps along the following lines:

‘ An individual who is at MClfA grade of experience in the subject, or with equivalent levels of experience with a suitable body of peer reviewed work, and membership of the appropriate specialist societies’.

(7) There was concern amongst ClfA’s Finds Group about the about the appendix on scientific analysis. It was felt that it might be more appropriate to reference existing guides, (e.g. Barclay 2001) with a brief list of the most common practices. Otherwise the danger, short of an exhaustive overview, is that some techniques are described more fully than others which may be seen as a stronger endorsement of them.

(8) The approach to assessment seems at times to be muddled, appearing in places, for instance, to advise the specialist not to do too much work (which was not considered appropriate for this document). The Finds Group was also extremely concerned that the draft told specialists to rely on quantification by non specialist’s assessment stage. Given the reality of the gap between assessment stage and analysis stage for many projects, it is useful and important for the specialist to have as good record as possible of an assemblage to proceed to analysis stage in the most efficient manner possible. Work carried out beyond the minimum should be subject to the expert opinion of the specialist in agreement with their clients. The apparent dismissal of base equivalent measures also disappointed the Group, given its usefulness in examining types of structured deposition.

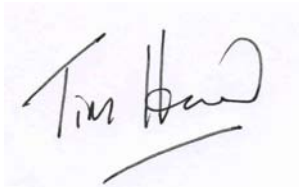
(9) Part of this confusion seems to come from the lack of a formal definition of the minimum amount of recording that should be done to any assemblage before it is deposited in archive. If this is the Basic record, then this needs to be made clearer (in which case this should be carried out at the assessment stage, in all but the most exceptional circumstances).

(10) Copyright and health and safety need to be addressed either in this document or in separate guidance to which reference could subsequently be made in this Standard.

(11) It is not clear how this project relates to other current and planned finds related projects funded by Historic England (such as the work on reference collections and on the application of standards in finds work). Cross-referencing, where appropriate, would be helpful.

ClfA and its Finds Group would be happy further to contribute to the development of this Standard, which, ideally, would ultimately be badged by the Institute as well as Historic England. 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