

International Heritage Team
Department for Digital, Culture, Media and Sport
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Delivered by email.

28 February 2024

Re: CIfA response to the consultation on the 2003 UNESCO Convention for Safeguarding of the Intangible Cultural Heritage

Dear DCMS Team,

I am writing to you on behalf of the Chartered Institute for Archaeologists (CIfA) to provide our organisation's views on the proposal to ratify the UNESCO 2003 Convention for Safeguarding of the Intangible Cultural Heritage, and the implementation of a national inventory for intangible cultural heritage.

Although we support the ratification of the Convention, and the introduction of an Inventory, our thoughts relate primarily to a concern that the consultation implies that intangible heritage is based on different principles from existing systems for heritage protection and management, insofar as it recognises public feeling and community involvement. This assertion mischaracterises existing approaches to tangible heritage and the historic environment, where community involvement and social/community value are central to professional practice.

Fortunately, we believe that this confusion can be avoided, and that the introduction of an intangible heritage to the UK's system for heritage management could be a huge opportunity to improve public understandings of and engagement with heritage of all types, be they tangible or intangible.

Our detailed comments are as follows:

1. Tangible heritage and community involvement and value

- 1.1. We are strongly supportive of the principle of community representation in heritage. However, we are concerned that the text of this consultation

misrepresents existing tangible heritage principles, and risks creating an unhelpful dichotomy between tangible and intangible heritage management.

- 1.2. People and communities are central to the recognition of cultural heritage of all types. This is equally true for tangible heritage sites and places, as it is for intangible cultural practices. Both must be recognised and supported by communities to carry meaning and value.
- 1.3. This idea has been embedded into professional heritage practice for nearly three decades. We request that government takes great care in its language to not imply that community value and public engagement or involvement in curating heritage are principles are something new that only apply to intangible heritage.
- 1.4. Perhaps the reason for the confusion is that tangible heritage protection legislation and policy has tended to not keep pace with current principles of heritage management in recent decades. Nonetheless, Historic England and historic environment professionals such as ClfA members work towards goals of inclusion in decision making and the generation of public benefit, for example through the extensive provision of public involvement in archaeological projects, or indeed the outcomes from professional archaeological works which generate public benefits in the form of new knowledge and understanding about a place's past, as well as public outreach outcomes like exhibits, shows, interpretation, etc.
- 1.5. We look at the introduction of an official inventory of intangible cultural heritage as an opportunity to invite more people to become involved in heritage and archaeology co-creation and exploration of heritage value – whether built, buried, or submerged. This would build on the excellent work done already to ensure that the tangible heritage that we protect, conserve, and investigate is the heritage that people value and which represents them.
- 1.6. We therefore encourage government to consider where it can introduce language that supports a broader commitment to ensure all heritage – tangible as well as intangible – is inexorably linked to community involvement and public value. We strongly advise that the DCMS Heritage Team is engaged with the International Team, and draws in sector voices, to help capitalise on this exciting opportunity.

2. *Criteria*

- 2.1. The consultation questionnaire asks for views on criteria which applications for the Inventory will need to meet. We support these criteria, subject to the qualifications below.
- 2.2. *Must be currently practised:* We consider that as a list of living heritage practices, which exists in large part to promote and preserve opportunity for the continuance of those practices, a criterion for being currently practised is important. However, there are certain elements of intangible heritage which may no longer be practised, or which have evolved, which are nonetheless important in terms of community

memory or value. The Inventory should recognise the evolution of practices and the potential for communities to retain memory and heritage feeling for things which may have changed over time. This includes by recording or referencing important aspects of practises which may have since evolved or died out. This would help in many cases to explain and explore the connections between local intangible heritage practices and the evolution of heritage within communities, and allow this to be more clearly valued by official heritage programmes. For instance, a local community may come to better understand it's urban industrial heritage characteristics of the places they live if the intangible heritage of local industrial heritage practices (e.g. those associated with coal mining, textiles, or potteries) are recognised in this Inventory, despite the fact that those processes have likely evolved. Similarly, the connections between historic dialects and local place names will remain import to local heritage, even if dialects like the Vale of Evesham's 'Asum Grammar' are no longer spoken. Inclusion of this type of intangible heritage would be a powerful opportunity to improve local understanding of the cultural heritage preserved around them.

- 2.3. *Can be from any time:* We agree that there should be no minimum age for a practise to be considered cultural heritage, especially for communities which have only established in the UK in recent years. However, practises which are older may be more likely to represent culturally significant examples – e.g. though influential ties to aspects of history, landscape, and life for a given community or place over time. As such, we recommend that age or longevity of a practice is considered to be a relevant consideration when assessing proposals to add to the Inventory, as any enduring practice is likely to be historically significant.
- 2.4. *Can originate from anywhere:* We strongly support the principle that imported (and especially adapted) cultural practices can be, and have been, adopted into UK cultural heritage. We consider that special attention should be paid to the elements of imported practices which reflect adaptation to places and communities specific to the UK, but this may not need to be a requirement.
- 2.5. *Must be a living practice and not a material product or object:* We consider that the UK may wish to depart from the UNESCO definition regarding 'living practices'. This is because the clearest representation of an aspect of local heritage may, in fact, be an object or material product. We support that Government has chosen to widen UNESCO's definition to include cultural foodstuffs, however, though the *processes* involved in food preparation may be significant, for most people, the significance is likely to relate to the object itself. We would therefore question whether the principle that this criteria is applicable, and whether it may unhelpfully restrict the listing of certain cultural objects (like foodstuffs) in the UK's register. We recommend allowing a degree of flexibility when considering material products or objects. For example, the inclusion of 'the Cornish pasty' on the Inventory would make more sense that 'the process of making (or consuming?) a Cornish pasty' which may be of remote significance.

Concluding points

We welcome the introduction of an Intangible Heritage Inventory and, subject to appropriate framing as a connected element of existing tangible heritage management – including the extensive forms of public involvement and community value that it represents – we expect this to be an exciting opportunity for the heritage sector.

Finally, we wish to stress that the process of implementing an Inventory will bear fruit only if it results in meaningful and ‘tangible’ benefits for the communities represented. It will be important for Government to consider how the Inventory will open up opportunities for communities to adopt management plans or seek funding for skills training or engagement events to preserve crafts, knowledge, and other recognised heritage practices. We hope that this second stage of consideration will not be far behind the first.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Rob Lennox', written in a cursive style.

Rob Lennox
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