

Mary Teehan  
Strategy Coordinator  
The Discovery Programme  
63 Merrion Square  
Dublin 2  
Ireland

28 January 2016

Dear Ms Teehan,

### **Archaeology 2025: Ireland's Strategy**

Thank you for the opportunity to comment on the discussion document, Archaeology 2025: Ireland's Strategy.

### **The Chartered Institute for Archaeologists**

The Chartered Institute for Archaeologists (ClfA) is a leading professional body representing archaeologists. 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 3,150 members and more than 70 registered practices across the United Kingdom and beyond (including the Republic of Ireland). 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 is also a member of the Northern Ireland Archaeology Forum (NIAF), a grouping of independent bodies concerned with archaeology in Northern Ireland.

## Archaeology 2025: Ireland's Strategy

### General

CIfA welcomes the formulation of an archaeology strategy for the 'island of Ireland' and regrets that it was not involved earlier in the process. The views expressed in this response are informed in part by the Institute's experience in other countries (for instance, in the drafting of the Scottish Archaeology Strategy<sup>1</sup> and the publication of the Southport Report on Realising the benefits of planning-led investigation in the historic environment<sup>2</sup>) which are pertinent.

Before providing detailed comments on the discussion document, the following general points should be noted.

(1) Although the project purports to extend to Northern Ireland, its focus is almost exclusively upon the Republic. Indeed, many of the descriptions of current practice, policy, regulations and structure refer solely to the Republic. If the document is truly to reflect all Ireland a lot more work will be required (including another round of consultation).

(2) Consideration of the role of professional institutes and professionalism in the discussion document is fairly rudimentary, and does not seem to take full account of their regulatory function and potential.

(3) While the document does in places identify some of the public benefits of archaeology (for example, recognising at page 20 that the '*knowledge created is a public asset*'), it should be much more explicit throughout that the rationale for archaeological work, particularly in planning- and development-led work, is ultimately the public benefit. That is the key driver.

(4) There are also concerns as to terminology. Archaeology is rightly defined on page 5 as 'study' since archaeology is a process. Unfortunately, elsewhere in the document the term seems frequently to be applied to those elements of the historic environment that are subject to study by archaeology (most glaringly in the section on 'physical archaeology' on page 6) – and the confusion is recognised on page 10, where noun and

verb are discussed. This is more than a pedantic point, as woolly thinking about what archaeology is tends to lead to less than incisive initiatives and solutions.

These (and the following detailed) concerns should not be taken to reflect any lack of support for the production of a strategy and ClfA would be happy further to contribute to the finalisation of such a document.

### **Detailed comments**

Under page 6, *'Those who Study & Research', 'Those who Practice'*

The distinction between those who study and research and those who practise is unhelpful and potentially reinforces the barriers that we are trying to erode. All archaeology involves research, which is not the exclusive reserve of universities and academies. The diagram on page 8 of the discussion document needs attention accordingly.

Under page 6, *'338 professionals in Ireland'*

The term *'professionals'* seems to be used here to refer to those who are paid to undertake archaeology. This is a misunderstanding, and again reinforces old misconceptions. Those applying professional standards should be regarded as 'professional' regardless of payment.

Under page 7, *'Those who Commission and Invest'*

The motivation attributed to *'Those who Commission and Invest'* seems to be compliance, which may be true but the potential of archaeology to add value to development and to meet the requirements of corporate social responsibility and other objectives should be noted. The issues are summarised in ClfA's client guide (<http://www.archaeologists.net/sites/default/files/ClfA-Client-Guide-low-res.pdf>).

Under page 7, *'Those who Regulate and Manage'*

This section omits reference to CifA, a professional body whose membership and activities are not confined to the United Kingdom. Furthermore, although the Institute of Archaeologists of Ireland (IAI) is identified as a professional body, the description of its role as representing the interests of the profession is incomplete. The primary function of a professional body is more accurately identified in CifA's Strategic Plan 2010 - 2020<sup>3</sup> as

*'...ensuring that clients and society in general receive the best possible service from the profession. Promotion of the interests of its members is a secondary role of a professional institute – though it is an important and valid one where professionals' interests are best served by continual improvement of standards of practice.'*

Under page 8, *'Those who benefit from archaeology'*

The statistics quoted relate only to the Republic and do not include Northern Ireland.

Under page 9, *'What is the Value of Archaeology'*

We would like to see a clearer, less equivocal appraisal of the value of archaeology in this section. Research in Northern Ireland (see the *Study of the Economic Value of Northern Ireland's Historic Environment* (2012) <https://www.doeni.gov.uk/sites/default/files/publications/doe/study-of-the-economic-value-of-ni-historic-environment-may-2012.pdf>) provides a quantification of the value of the historic environment in Northern Ireland and much work has been done elsewhere in the United Kingdom on the social value of heritage (see, for instance, the annual research review of *Values and Benefits of Heritage* (2015) produced on behalf of the Heritage Lottery Fund: <https://www.hlf.org.uk/values-and-benefits-heritage> and *Quantifying and Valuing the Wellbeing Impacts of Culture and Sport* (2014) produced on behalf of DCMS: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/304899/Quantifying\\_and\\_valuing\\_the\\_wellbeing\\_impacts\\_of\\_sport\\_and\\_culture.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/304899/Quantifying_and_valuing_the_wellbeing_impacts_of_sport_and_culture.pdf)). Indeed, it would be helpful more clearly to spell out the well-being benefits derived from archaeology in this section.

Under page 10, *'Identity Value'* reference to ISIS and Palmyra

Discussion of the motivations of those who destroyed Palmyra is not wholly helpful here.

Under page 11, *'Economic Value'*

It is not clear by whom archaeology is seen as *'a moral duty and a financial burden'*. Nonetheless, ClfA welcomes the recognition of the constructive approach that the European Union is increasingly taking to cultural heritage and its contribution to economic, social and environmental objectives. With this in mind, the reference at the end of the third sentence to *'environmental protection'* as distinct from protection of cultural heritage (which includes the historic environment) is unhelpful as environmental protection should embrace both the natural and historic environment.

As noted above, research in relation to Northern Ireland should be included in this section in addition to that relating to the Republic.

Under page 12 et seq, *'Areas for Action'*

This relates solely to the Republic of Ireland and does not focus upon Northern Ireland.

Under pages 12-13, *'Local Authorities'*

The discussion of the practical difficulties of managing the archaeological resource through the planning system (for instance, through the operation of planning conditions) is useful. It would be helpful to include some consideration of the limitations of preservation-by-record as a practical and conceptual tool - namely the failure to recognise that excavation actually destroys rather than preserves the evidence. Expressly recognising that what is involved is off-setting or compensation (rather than preservation) through an increase in public knowledge paves the way to a more to a more responsive, significance- (rather than fabric-) based approach. (See *Re-thinking development-led archaeology*, (2010) <http://webcache.googleusercontent.com/search?q=cache:dqWwvLoluWYJ:www.famearchaeology.co.uk/wp->

[content/uploads/2010/07/roger\\_m\\_thomas\\_fame\\_york\\_paper-amended.doc+&cd=4&hl=en&ct=clnk&gl=uk](content/uploads/2010/07/roger_m_thomas_fame_york_paper-amended.doc+&cd=4&hl=en&ct=clnk&gl=uk) by Roger Thomas.)

Under page 14,

**Question: What is the best model for the archaeological administrative system?**

Local authorities have a key role to play in the management and protection of the historic environment. ClfA is not prescriptive as to how archaeological services should be delivered, but is clear that, however they may be delivered, they must comply with professional standards so as properly to safeguard and manage the archaeological resource for the communities that they serve (see ClfA's *Standard and guidance for archaeological advice by historic environment services* (2014) [http://www.archaeologists.net/sites/default/files/ClfAS&GArchadvice\\_2.pdf](http://www.archaeologists.net/sites/default/files/ClfAS&GArchadvice_2.pdf)).

One model worthy of consideration is that adopted in Wales where regional archaeological trusts successfully provide archaeological advice and expertise to local authorities. All four of the Welsh Archaeological Trusts are registered under ClfA's Registered Organisations scheme (<http://www.archaeologists.net/regulation/organisations>).

**Question 6: Would a centralised hub for project archaeologists be of benefit to private development?**

Yes. Professional bodies such as IAI and ClfA could provide such a hub either through individual membership or registration of organisations (see above), both of which provide assessment and accountability.

Under page 14, '*Embedding Standards*'

Care needs to be taken not to confuse standards and standardisation. Professional bodies (in this case IAI and ClfA) have a central role to play in the formulation and enforcement of standards, which is not adequately reflected in the discussion document. Indeed, the document fails to recognise that IAI and ClfA have already set standards (in ClfA's case linked to professional conduct processes:

<http://www.archaeologists.net/codes/ifa>). While there is always room for improvement, reinvention is unnecessary; wider adoption and use are what are required. This can be brought about through legislation, policy and guidance and requirements can be embodied in contract terms and planning or other regulatory requirements.

There needs to be a clear regulatory, contractual and professional conduct link between the licence, the planning or other permission, the plot of land and the accredited professionalism of the project leader or organisation. At its most fundamental level, licence eligibility should be dependent on professional accreditation by IAI or ClfA, and the licence should be linked to the project, permissions and obligations, not just the plot of land. Professional accreditation brings in a requirement to meet professional standards, which solves most post-excavation problems (other than breach of contract by the client, which can be addressed in other ways). We would be happy to discuss these issues further.

Under page 15

**Question: What areas could be addressed in revised Codes of Conduct for the profession?**

The formulation and enforcement of codes of conduct are primarily matters for professional bodies and not government organisations. ClfA's Code of conduct<sup>4</sup> is formulated to regulate all archaeological activities although we are always happy to discuss revisions to the Code to improve its efficacy.

Under page 16

**Question: What changes could be made to make regulations more efficient and effective?**

See above.

Under page 16, *'a professional-wide agreement not to pay below a living wage.'*

ClfA recognises the consequences of low pay in the profession as identified in the discussion document and strongly supports the aspiration

for all archaeologists to enjoy appropriate pay and conditions (<http://www.archaeologists.net/practices/pay>). Nevertheless, care needs to be taken to ensure that any agreement as to pay is not seen to be anti-competitive and challengeable as such.

Under page 16, *'Sole traders ... CPD courses in business and finance management, marketing legal and other skills'*

CifA runs' occasional business start-up training sessions for small practices and sole-traders and would be happy to do so in Ireland possibly in partnership with IAI.

Under page 16, *'Improving Economic Factors'*

The contribution of developers to funding research should not be overlooked.

Under page 17, *'Refining Legislation'*

This section makes no reference to legislation relating to Northern Ireland.

Under page 18, *'Legislation Gaps'*

Legislation as well as policy could usefully recognise how professionalism could solve many issues identified in the discussion document.

Under pages 19-20, *'Excelling in Research and Education'*

The discussion document should make clear the role of professional bodies in providing or facilitating the provision of vocational training. Greater consideration could also be given to in-work learning (see CifA's training toolkit<sup>5</sup>).

Under page 20, *'Research and Collaboration'*

All archaeological work, if carried out properly, involves research which is ultimately for the public benefit. Consequently research is carried out on



behalf of developers whose *'funding for professionals, engaged in the commercial sector to conduct research'* is significant.

Under page 21

**Question: What incentives are there in place for CPD training?**

There are professional obligations for those accredited as members of professional bodies (see ClfA's CPD requirements: <http://www.archaeologists.net/development/cpd>).

**Question: What can a research agenda offer to archaeology?**

Direction.

Under page 22, *'Legacy Issues'*

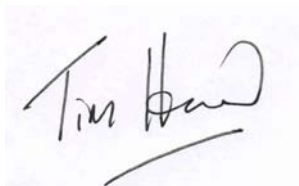
More consideration is needed in this section of enforcement through planning, licences and professional accountability.

Under page 23, *'Perception of Archaeology ... the reality of a highly qualified, typically under-paid, but passionate profession'*

ClfA is fully committed to enhancing the status of archaeologists and addressing issues as regards inadequate pay and conditions. However, in some contexts it will not be appropriate to reinforce the perceived low value of archaeologists.

ClfA would be delighted to engage further in the development of this strategy, hopefully alongside IAI. 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/index/heritage/archaeology/archaeology-strategy.htm>
  - 2 <http://www.archaeologists.net/sites/default/files/SouthportreportA4.pdf>
  - 3 <http://www.archaeologists.net/sites/default/files/Stratplansummary.pdf>
  - 4 <http://www.archaeologists.net/sites/default/files/CodesofConduct.pdf>
  - 5 [http://www.archaeologists.net/sites/default/files/2014.PPP\\_Training-toolkit-web\\_0.pdf](http://www.archaeologists.net/sites/default/files/2014.PPP_Training-toolkit-web_0.pdf)