

Response ID ANON-XCS9-1DGZ-W

Submitted to Consultation for Historic Environment Scotland's corporate plan 2025-28
Submitted on 2025-01-03 16:13:08

Introduction

1 Do you consent to our privacy statement?

Yes, I consent to this privacy statement

About you

2 Are you responding as an individual or on behalf of an organisation?

On behalf of an organisation

Please share the name of the organisation you are responding on behalf of::
Chartered Institute for Archaeologists

3 Please enter the first part of the postcode belonging to you/your organisation, e.g. EH1.

Postcode (first part only)::
RG6

4 Which of the following is your main area of interest? Please select one option only.

Archaeology

If you choose 'Other', please specify here::

5 Which of the following best describes you or your organisation? Please select all that apply.

Other (please specify below)

If you choose 'Other', please specify here::
Professional body

6 Which areas do you or your organisation work in? Please select one. (Please tick not applicable if this question does not apply to you)

UK wide- e.g. you/your organisation are based in and/or operate nationally

Our Vision and Principles

7 Our vision is: heritage for all.

Yes, I support this vision statement.

Please explain your answer here::

The vision statement has not changed since 2014, and we support this consistency. The vision is simple, and that is a good thing. We welcome the verb 'investigate' which directly covers archaeology – which is the process of investigating the physical remains of the past, and which sometimes gets lost in HES' language and priorities. We therefore strongly support language relating to 'investigate' and 'understand'. We strongly welcome the focus on benefiting people and communities as the ultimate outcome of HES' work.

8 We've identified a set of principles to guide our work over the next three years. Do you agree with these principles? Please use the text box to explain what you like about them or what you would change. You do not have to choose a response option to comment in the text box.

Vision and principles - principles - Heritage should be for everyone:
Yes, I agree

Vision and principles - principles - People sit at the heart of heritage:
Yes, I agree

Vision and principles - principles - We need to work with others:
Yes, I agree

Vision and principles - principles - We must focus our work on the areas where we can make the most impact:
Not sure

Vision and principles - principles - We must find new ways of doing things:

Not sure

Please add any comments on the principles here::

CifA strongly agrees that heritage should be 'for everyone' and that people sit at its heart. It is ultimately necessary that heritage must serve the public by providing benefits, such as knowledge and understanding about a past, respecting the public's diversity of interests and the ability of heritage to tell diverse stories relevant to all people. We must understand the widest range of these benefits – which may be direct and indirect - from the economic contribution from tourism, to enabling sustainable housing delivery, to informing and enabling discussion of key societal topics such as climate change or population movement.

We also strongly support the need for HES to work with others. HES is Scotland's lead body for the historic environment, and the lead advisor to Government. HES should return to the use of this (or similar) language in its corporate plan. The plan should also explicitly recognise the relationships and responsibilities that are implied by these roles, notably with various parts of national and local government, arm's length agencies, independent bodies, and individuals who have a role in managing, investigating, and celebrating Scotland's heritage.

We would also stress that working with others should imply a need to support work delivered by other parts of the sector, with HES recognising a responsibility towards the historic environment. This would mean, for example, recognising HES's role in relation to local government and planning, where a clearer role in supporting local authorities is needed. It would also include supporting strategic sector initiatives like Scotland's Archaeology Strategy, which we think should be mentioned in the Corporate Plan.

We are less certain about focusing on the areas of greatest impact. We are concerned that HES does not have a firm basis for comparing different outcomes, and we are already concerned that vital HES responsibilities such as the work of the Survey and Recording Team, or investment in Scotland's Historic Environment Data (SHED) are being de-prioritised. A loosely defined imperative to seek the 'greatest impact' could be used to mask decisions that will be detrimental to parts of our heritage and the sector's work. We also caution HES to consider not only the areas where it can make the greatest impact, but also the areas where no-one else can realistically do, or fund, the work that needs to be done.

We are also happy that HES needs to pursue efficiency in all its work and address where current practice is unsustainable, but without further interpretation, we do not fully support the principle of needing to find 'new ways of doing things'. What does this proposed change actually mean? What is it intended to deliver?

Our Priorities, Outcomes and Actions

9 We have identified five priorities for HES to focus on over the next three years. Do you agree with them? Please use the text box to explain your answer. You do not have to choose a response option to comment in the text box.

Priorities, outcomes, and actions - priorities - Scotland's heritage:

Yes, I agree

Priorities, outcomes, and actions - priorities - Skills and learning:

Yes, I agree

Priorities, outcomes, and actions - priorities - People and places:

Yes, I agree

Priorities, outcomes, and actions - priorities - Climate action:

Yes, I agree

Priorities, outcomes, and actions - priorities - Inclusion and resilience:

Yes, I agree

Please add any comments on the priorities here::

We are pleased to see Scotland's heritage topping the list of priorities - this is the core basis for HES' existence, and while the subsequent priorities are vital to the effective achievement of outcomes, it is right that the heritage is at the heart of the orbit of this other activity. Ideally, we would add a commitment to renewing Scotland's Archaeology Strategy (SAS) as an action under this priority.

We also strongly support skills and learning as a priority, and are pleased that the Skills Investment Plan gets a specific mention in the Plan. HES' support for strategic initiatives like SIP and SAS is an important enabler for sector action. Ongoing commitment to funding these types of initiatives generally, and specific reference to the renewal of Scotland's Archaeology Strategy should be included in the Corporate Plan.

10(a) Each priority has a set of outcomes associated with it. Do you agree with these outcomes as the main areas for HES to focus on within Priority 1? Please use the text box to explain your answer. You do not have to choose a response option to comment in the text box.

Not sure

Please add any comments on the outcomes here: :

We think there needs to be additional wording in the first paragraph in this section that more directly responds to the historic environment beyond HES' managed assets. We recommend editing the sentence "And it means shaping and influencing how others look after the historic assets in their charge" to

include direct reference to assets managed within the planning and other land-use systems (e.g. forestry, agriculture, and marine conservation) and private owners.

In Priority 1's Outcomes section, we would welcome a specific reference to HES' contribution to Scotland's Archaeology Strategy (SAS). It is critical that HES is committed to supporting outcomes of this strategic sector initiative, which should act as both a rolling strategic plan for archaeological sectoral development and a forum for collaboration between key partners seeking these positive outcomes for the discipline. We would also welcome a reference to SHED in sub-paragraph (d) of Outcome 2.

10(b) Do you agree with these outcomes as the main areas for HES to focus on within Priority 2? Please use the text box to explain your answer. You do not have to choose a response option to comment in the text box.

Yes, I agree with the outcomes

Please add any comments on the outcomes here::

As above, we note that the Skills Investment Plan gets a specific mention in Outcome as a strategic initiative that is supporting skills outcomes, especially for archaeology. This is positive, as is the commitment to traditional skills and intangible heritage knowledge. However, we would welcome a broader commitment to other skills issues. For example, those that may be targeted by a revised Scotland's Archaeology Strategy, even if these cannot be specified at the current point in that strategy's review process.

Outcome 5's actions are, similarly, all focused solely on traditional skills, and we wonder if these fairly represents the breadth of the Outcome? If specific actions cannot yet be identified, then a commitment to use sector support and grant giving to support wider objectives would suffice.

10(c) Do you agree with these outcomes as the main areas for HES to focus on within Priority 3? Please use the text box to explain your answer. You do not have to choose a response option to comment in the text box.

Yes, I agree with the outcomes.

Please add any comments on the outcomes here: :

We welcome commitments in Outcome 7 sub-paragraph (d). This would potentially be a good place to include robust commitment to ensuring that planning policy is strengthened (e.g. by renewing PAN2/2011) and local government provision of historic environment advice is not weakened. These preventative actions would ultimately help prevent the loss of opportunities to utilise heritage to contribute to growth in the economy.

10(d) Do you agree with these outcomes as the main areas for HES to focus on within Priority 4? Please use the text box to explain your answer. You do not have to choose a response option to comment in the text box.

Yes, I agree with the outcomes

Please add any comments on the outcomes here::

10(e) Do you agree with these outcomes as the main areas for HES to focus on within Priority 5? Please use the text box to explain your answer. You do not have to choose a response option to comment in the text box.

Yes, I agree with the outcomes

Please add any comments on the outcomes here: :

11 Do you think any actions are missing to deliver against any of the outcomes?

Please add any comments on actions here::

We note that there are some outcomes which are describing work that is already well developed and in train, and others which are more loosely defined, which presumably are not at a point where detailed commitment can be made. We hope that nods can, however, be made towards crucial aspects of HES' ongoing commitments (as mentioned in our answers to previous questions) to sector support, e.g. the Historic Environment Grants Programme, support for the renewal of Scotland's Archaeology Strategy – including requirements for its outcomes, and other important work like HES' survey and recording, as well as support for arms-length programmes like SHED, and wider sector delivery.

Impact Assessments

12 How do you think the proposals presented in the plan might impact on people in terms of their protected characteristics? Please add any comments in the text box below.

Impact assessments - protected characteristics - Age:

Impact assessments - protected characteristics - Sex:

Impact assessments - protected characteristics - Sexual orientation:

Impact assessments - protected characteristics - Gender reassignment:

Impact assessments - protected characteristics - Disability:

Impact assessments - protected characteristics - Race and ethnicity:

Impact assessments - protected characteristics - Pregnancy and maternity:

Impact assessments - protected characteristics - Marriage and civil partnerships:

Impact assessments - protected characteristics - Religion or belief:

Please add any comments below::

13 What impact do you think the plan might have on the competitiveness of Scottish businesses, the third sector or the regulatory context?
Please add any comments in the text box below.

Not Answered

Please add any comments below::

14 What impact do you think the plan might have on people in island communities? Please add any comments in the text box below.

Not Answered

Please add your comments below::

15(a) Has our environmental assessment identified the likely environmental effects of the new plan?

Not Answered

Please add any comments below::

15(b) Do you think there are any additional environmental mitigation, enhancement, or monitoring measures that should be considered?

Not Answered

Please add any comments below::

15(c) Do you have any other comments on the environmental assessment? If so please comment below.

Please add your comments below::

16 What impact, if any, do you think that the Plan might have on Children's Rights and Wellbeing?

Impact Assessment - Children rights:

Demographic questions

17 Please tick all the statements that apply to you.

18 What is your age?

Not Answered

19 How would you describe your race and/or ethnicity?

Not Answered

If you choose 'Other' Ethic Groups', please specify here::

20 What religion, religious denomination or body do you belong to?

Not Answered

If you choose 'Another religion or body', please specify here::

21 How do you describe your gender?

Not Answered

If you choose 'In another way', please specify here::

22 Which of the following best describes your sexual orientation?

Not Answered

If you choose 'Other sexual orientation', please specify here::

Final comments

23 Do you have any final comments on the draft plan?

Please add your comments below::

ClfA has at various points observed several issues in HES' approach to its corporate activities, and we have advised that these are addressed in the Corporate plan:

(1) Sector support: the need for HES to act as a leader and enabler of sector activity, committing to sector support and partnership working. There has been much improvement in this since 2014, for example, working through the Scottish Strategic Archaeology Committee, and the continual funding of major sector delivery programmes like ScAPE and Dig It!. However, there remains a need to consider wider grant-aid funding goals for archaeological research, and there is a perennial concern over diminishing funding availability. We note that archaeology is not mentioned in the current Corporate Plan draft and recent internal changes at HES has reduced its organisational visibility/authority - at least as far as we see as an independent partner organisation.

(2) Relatedly, we often observe a narrow focus on HES' direct deliverable activities, e.g. its properties in care, and its role in designation, rather than the wider needs of the historic environment. This is understandable to a degree, but we would be grateful for recognition in documents like the HES Corporate Plan, that HES is not simply responsible for achieving the best in its core roles, but achieving the best for the entirety of the historic environment.

(3) Planning system support: Most specifically, the issue above can be seen in HES' reluctance to provide guidance and support in consideration of local government's role in planning. At the moment, there is an appearance of a lack of responsibility being taken for promoting with Scottish Government the need for an update to PAN2/2011. At the same time, local authorities such as Perth and Kinross are re-initiating the national trend of cutting support for historic environment advice services and HERs. Whilst HES takes a legitimately cautious line on directly seeking to influence local government decision-making, it would be helpful for HES to take a stronger stance on the need to maintain an HER and the reasons that historic environment advice is critical to development management, and what obligations councils may have under NPF4. We would like to see a broad commitment to HES' role in managing these issues in the Corporate Plan.

(4) HES' Government Advice Role: We have regularly commented in the past that we believe that there is insufficient stated commitment by HES to its role as the lead advisor to Government on the historic environment. While we know that there are links between HES teams and Government departments on various policy issues, the strategic importance of this work deserves to be stated in official corporate strategy. We still believe that the original expectation of a Historic Environment Policy Unit in Scottish Government was ultimately not delivered in a reasonable form, and that there has been a lack of assurance that Government officials are receiving consistent advice and support from HES to ensure that policy issues are raised and given appropriate weight in Government programmes. We would strongly support this being addressed in a form of words in the Corporate Plan.