Response ID ANON-VZHT-9YYG-X

Submitted to Consultation for Scotland's new historic environment strategy
Submitted on 2023-02-10 14:40:34

Introduction

1 Do you consent to to our GDPR statement?

Yes I consent to this GDPR statement

Are you responding as an individual or organisation?

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

On behalf of an organisation

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

Postcode text box:
EH1

4 Which areas of the historic environment sector is your organisation/ are you involved with? Please select all that apply.

Archaeology, Archives or Collections, Museums, Community heritage, Education, training and life-long learning, Built Heritage, including historic buildings, monuments and industrial heritage sites, Intangible Cultural Heritage, such as cultural traditions, Planning system, Urban and rural development, Other (please specify below):

Text box for other:
research and grants, history, international dimensions of Scottish cultural heritage

About you

5 Which of the following are you responding on behalf of? Please select one option only.

Charity or third sector organisation with a heritage purpose (not for profit)

Text box for other response:

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)

International- e.g. you/your organisation are based in and/or operate internationally

7 If you are responding as someone who works in the historic environment sector, what size is the organisation you work for? This includes paid employees and volunteers. (Please tick not applicable if this question does not apply to you)

headcount more than 1000

Demographic questions

8 Please let us know if any of the below apply to you.

9 What is your age?

age in number:

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

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

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

Not Answered

If other, please describe here:

12 How do you describe your gender?

Not Answered

If other, please describe here:

13 Which of the following best describes your sexual orientation?

Not Answered

If other, please describe here:

Our shared mission and principles

14 Our aim is for this strategy to support prioritisation, and to help realise the value of the historic environment. We have drafted the statement below with this in mind. Do you support this mission statement? Please use the text box to explain what you like about it or what you would change. You do not have to choose a response option to comment in the text box.

No I do not support this mission statement.

Text box to explain answer:

"for the benefit of our society" is a bit exclusionary. Perhaps just "to benefit society" – this would include e.g. foreign tourists, potentially excluded by "our society".

Make power plural.

15 These are the six principles that have been identified in feedback from the engagement workshops. Do you agree with them?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.

Priority matrix agree/disagree - We must put people at the heart of this strategy:
Yes I agree

Priority matrix agree/disagree - We must face the climate and biodiversity crises:
Yes I agree

Priority matrix agree/disagree - We must care for, and protect, our heritage assets:
No I do not agree

Priority matrix agree/disagree - We must work collaboratively across sectors:
Yes I agree

Priority matrix agree/disagree - We must be prepared to make difficult decisions:
Yes I agree

Priority matrix agree/disagree - We must make inclusive and transparent decisions:
Yes I agree

Please add any comments on principles here:

Putting people at the heart is correct, but then goes on to reduce the scope to "people across Scotland", we should also embrace tourists/visitors and others with connections to Scotland's past but who reside elsewhere (the diaspora). Need to broaden from national to international aspirations here.

"We must act on the climate and biodiversity crises" could/should add the fact that we need to reconcile the impact of tourism and find ways of encouraging it within a sustainable framework. Alternatively add this to the transparent/difficult decisions paragraph.

"The historic environment has a vital role to play in supporting good, green jobs, and promoting low-carbon materials and skills." It also has a vital role to play in understanding and vividly exemplifying the impact of climate change, as well as opportunities to provide innovative solutions.

"We must care for, and protect, our heritage assets" could become "We must understand, care for and protect our heritage assets" to incorporate the principles we enshrined previously in the first version of OPiT and ensure these are taken through this new mission-led version and links directly to other strategies that are based on this previous version and may not be able to pivot quickly to reflect the new national strategy.

A suggested new paragraph might read something like: "Our heritage - whether tangible or intangible, cultural or natural – is the resource that allows us to create benefits and realise our outcomes. We do not protect our historic environment for its own sake, but because of the value that it delivers to society. We need to understand our heritage, through investigation, recording, and working with communities. We also need to keep assets in good shape – used responsibly and sustainably. We owe it to future generations to leave them assets that they can value, understand, enjoy, and benefit from just as we do today."

We understand that some respondents are suggesting a new skills principle based on responses during consultation especially within the archaeology sector: "We must make effective use of specialist skills and capacity". We would be happy to support that and that merging of "We must be prepared to make difficult decisions" and "We must make inclusive and transparent decisions".

The former skills principle might read: "A wide range of professionals and specialists work to understand, protect and promote the historic environment and it is recognised that that these are fundamental to delivering the range of outcomes in this strategy. We must strive to ensure that people can acquire and use the skills that they need or desire to help deliver public benefit, creating accessible and sustainable careers and improving access for all."

Alternatively the KPI 3: "Created new pathways for key green skills to deliver the
historic environment's net zero transition" could be reworded to something like "Created new pathways for key skills to deliver the historic environment's strategic ambitions and net zero transition" with a key set of KPIs which reflect the requirement to increase pathways to careers in heritage, especially for our purposes in history and archaeology.

A merged principle regarding decision-making could read: "We must be prepared to make difficult decisions through improved inclusion and transparency" with a para that reads something like: "We recognise that limited resources mean we can't do everything, and nor can we commit to sustaining every heritage asset over the long term. Prioritising means emphasising or resourcing some things over others, and we acknowledge that some things might be lost to the future as a result. This strategy will help to make well-informed, transparent, consistent, timely, and proportionate decisions, and to take risks where they can help to find solutions to the challenges we face. Early dialogue and close collaboration are key to ensuring this, as is empowering communities so that they can shape the future of their places. But we also need to recognise that every community is different, and that we need to adapt our work and relationships as a result. If we can do this, we can achieve the outcomes we want to achieve while caring for and protecting our assets, our communities, and our planet."

Our priorities, outcomes and actions

16 We have identified three key priorities as the focus for delivery over the next five 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, do you agree - Enabling the transition to net zero:
Yes I agree with this

Priorities, do you agree - Empowering vibrant, resilient, and inclusive communities and places:
Yes I agree with this

Priorities, do you agree - Building a wellbeing economy:
Yes I agree with this

Please add any comments on priorities here::

The Society is aware that these priorities have arisen from extensive consultation and commend them as issues that the sector must engage with. However, we are also aware that the sector will need to continue with core issues highlighted in the first version of Our Place in Time (OPiT), and that there is a concern that with only three priorities the "bread and butter" of heritage work may be derailed or underfunded. CIfA have suggested that a preamble to the priorities includes reference to this continuing work, and we would support the insertion of something similar like:

"Scotland's historic environment creates benefit for society in many ways, from protecting assets that people value, helping us to understand them and the stories they tell better by investigating them, making them accessible to communities and tourists, contributing to our economy and enhancing places and the environment. This strategy does not detail all these benefits but focuses on three key priority areas for action, and identifies those outcomes that we'll work to realise over the next five years. Achieving these outcomes will bring us closer to realising our mission in these key areas, while making a real difference to people's lives in the process"

The Priority 1 preamble is, naturally, focused on assets, mainly buildings, but could emphasise the importance of changing how we operate too; the closest is "environmentally sustainable business models" - but there are plenty of people operating in the sector that would not consider a business model relevant to them. A change of wording here could bring in others such as volunteers and academics.

When discussing emissions should preface with "harmful", it may be useful to use this instead of "carbon" to allow all potentially harmful emissions to be encapsulated.

Priority 2 - perhaps need to emphasis the contribution that volunteers make vs the challenge of the reduction in their number. Need to emphasis EDI in this priority preamble, stating the need for more diversity in leadership and among decision-makers (evidence for lack of as stats?).

Priority 3 - need to emphasise the contradiction in relation to economic contribution made by tourism and issues relating to sustainability – a key issue for heritage sector. Also need to define "responsible tourism".

17 Each priority has a set of outcomes expressed as Key Performance Indicators (KPIs) associated with it. Do you agree with these KPIs? Please use the text box to explain your answer. You do not have to choose a response option to comment in the text box.

I suggest changes to one or more of the KPIs and/or have ideas for additional KPIs

If you have comments on the KPIs, including new or different measures that could be used, please comment below::

In general we suggest organising actions according to issue to be addressed e.g. enabling works – establish carbon emissions baseline, VAT rebate; skills & training; procurement and supply chain; sustainable tourism etc. to make actions a bit clearer.

The strategy could be clearer on how the stats provided in the preamble relate to the points/issues that are going to be addressed in the strategy period, and how will the historic environment meet Scotland's 2030 targets for heat in buildings etc.?

KPI 1

Could include in "nationally we will":

Historic housing stock is not in good condition – 71% of Scotland's pre-1919 homes have critical elements such as roofs, chimneys and windows in a state of disrepair. In addition to the detrimental impact on the buildings in respect of their survival these buildings are not energy efficient [Measure - is this better or worse or the same over time?]

The construction sector doesn't have the skills to address the condition of traditional buildings – 95% of contractors in the construction industry have no qualifications to work on traditional buildings; it is estimated that 10,000 new jobs will be needed over the next decade to maintain and adapt Scotland's traditional building stock [this sounds like a very significant skills deficit! Measure - is it better, worse or the same as previous plan period?]

Also, in what ways is climate change affecting the historic environment specifically? Issue to be measured?: damage to/loss of heritage assets (buildings, landscapes, archaeology, coastlines), but in this are factors in our control: adaptation and resilience; energy use; procurement (supply chain) and visitor travel – these are all made reference to in the actions under KPIs but could be clearer overall?

A national 'we will' should include support and advice to those looking to reduce harmful emissions through their operations.
Also some support and advice to help the "locally you can" "Work to improve the carbon literacy of your organisation..." would be very welcome at national level.

KPI 3
The action to "Re-evaluate the provision and delivery of...academic education to improve provision" will require the collaboration of higher education institutions and other HE provision bodies such as SFC to deliver.

KPI 4
The focus only on organisations that undertake "care" is unfortunate, again bringing in the previous OPiT terminology here would be helpful, we suggest: "Supported organisations that study, care for and promote the historic environment to to have the right skills and be more resilient"

A "nationally we can" action could include: "Support skills audits and cross-sectoral partnerships which can provide training, share skills, knowledge and capacity to address identified needs" as per the CIfA suggestion.

Under "locally you can" - what is the goal for updating a reserves policy?

KPI 5
While the emphasis on increased community voice in decision-making is welcome, the measure is too focused on planning and doesn't include, for example, increased community voices in other decision-making arena's, such as for example those undertaken by HES or LAs on designation, or elsewhere on creation and development of research frameworks.

The measure could be: "Evidence that the historic environment is mainstreamed across relevant local, regional, and national plans and that community engagement is visible in other decision-making arenas".

"Nationally we will" could include something about ensuring we work collaboratively to ensure that the historic environment is embedded in relevant legislation and policies (for example the recent draft Agriculture Bill and potentially other legislation and policies required after Brexit).

"Locally you can" could include a call to action for people to advocate for the historic environment to their local decision-makers and representatives. This will become more important as resources dry up and we face the challenges outlined earlier in the Strategy.

KPI 6
The measure "Established shared decision-making mechanisms involving young people with heritage, and delivered local and national actions" doesn't reflect the actual KPI to increase participation by young people - surely one measure would be exactly that - increased numbers of young people getting involved, and the "Nationally we will" should include a baseline study to build on the old HEACS report on strategies for engaging young adults in the historic environment, NLHF evaluation of Year of Young People 2018, and measuring young person's participation now so we can measure improvement.

It would also be useful to have a clearer line-of-sight from the preamble to KPI 6.

In the "Nationally we will" actions what is the importance of "external" in the first bullet point - surely involvement alone would suffice?

Additionally, is the action "Make recruitment processes for jobs and volunteer opportunities more attractive to, and easily accessible for, young people", really to look at recruitment processes (advertising? interviewing?), or simply to make jobs and volunteer opportunities more attractive and more easily accessible to you people?

KPI 7
What is a "responsible economic contribution"? Any economic contribution so long as it is carbon neutral? See also above Q16 - definition required of "responsible tourism".

"Nationally we will" could include reference to ensuring the historic environment is embedded in relevant future Scottish Government legislation and policies (as well as strategies) - again using the Agriculture Bill where inclusion of the historic environment could help drive local heritage-led tourism and heritage-based diversification of agri-business.

Given the recent NPPF4 draft, and Archaeology Strategy Aim 3, it would be useful to include reference to improving public benefit outcomes from historic

environment management activities. For example: "Nationally we will" "Ensure that those managing change to the historic environment have can maximise potential for public benefit from those activities".

KPI 8
Here we would support the CIfA suggestion that reference to all five of the Fair Work Framework (Fair work is work that offers effective voice, opportunity, security, fulfilment and respect) is emphasised here, and the KPI includes the ambition to support sector work on improving pay and conditions.

KPI 9
There is potential here to mention Scotland's Archaeology Strategy which has increasing engagements with archaeology under Aim 4.

18 Under each KPI, we have set out the actions we might take at national level to deliver our mission. Do you think these actions are the right ones to deliver against the KPI? Can you suggest alternatives?

I suggest changes to one or more of the actions and/or have ideas for additional actions

Text box for alternative actions:

We would suggest it is made clear that these actions are only a sample of what can be done - indeed, perhaps this part of the strategy could be iterative - adding and removing actions as ideas surface which help deliver on the KPIs or when actions or even KPIs are fulfilled.

See our answer to Q17 for context, but reiterated here:
KPI 1
Historic housing stock is not in good condition – 71% of Scotland's pre-1919 homes have critical elements such as roofs, chimneys and windows in a state of disrepair. In addition to the detrimental impact on the buildings in respect of their survival these buildings are not energy efficient [Measure - is this better or worse or the same over time?]

The construction sector doesn't have the skills to address the condition of traditional buildings – 95% of contractors in the construction industry have no qualifications to work on traditional buildings; it is estimated that 10,000 new jobs will be needed over the next decade to maintain and adapt Scotland's traditional building stock [this sounds like a very significant skills deficit! Measure - is it better, worse or the same as previous plan period?]

Also, in what ways is climate change affecting the historic environment specifically? Issue to be measured?: damage to/loss of heritage assets (buildings, landscapes, archaeology, coastlines), but in this are factors in our control: adaptation and resilience; energy use; procurement (supply chain) and visitor travel – these are all made reference to in the actions under KPIs but could be clearer overall?

A national 'we will' should include support and advice to those looking to reduce harmful emissions through their operations.
Also some support and advice to help the "locally you can" "Work to improve the carbon literacy of your organisation..." would be very welcome at national level.

KPI 3
The action to "Re-evaluate the provision and delivery of...academic education to improve provision" will require the collaboration of higher education institutions and other HE provision bodies such as SFC to deliver.

KPI 4
A "nationally we can" action could include: "Support skills audits and cross-sectoral partnerships which can provide training, share skills, knowledge and capacity to address identified needs" as per the CIfA suggestion.

KPI 5
"Nationally we will" could include something about ensuring we work collaboratively to ensure that the historic environment is embedded in relevant legislation and policies (for example the recent draft Agriculture Bill and potentially other legislation and policies required after Brexit).

KPI 6
"Nationally we will" should include a baseline study to build on the old HEACS report on strategies for engaging young adults in the historic environment, NLHF evaluation of Year of Young People 2018, and measuring young person's participation now so we can measure improvement.

In the "Nationally we will" actions what is the importance of "external" in the first bullet point - surely involvement alone would suffice?

KPI 7
"Nationally we will" could include reference to ensuring the historic environment is embedded in relevant future Scottish Government legislation and policies (as well as strategies) - again using the Agriculture Bill where inclusion of the historic environment could help drive local heritage-led tourism and heritage-based diversification of agri-business.

"Nationally we will" could also include "Ensure that those managing change to the historic environment have can maximise potential for public benefit from those activities".

In addition we support the CIfA suggestion that national KPIs could include direct reference to Scotland's Archaeology Strategy delivery aspirations. We defer to the Scottish Strategic Archaeology Committee for examples, but could include for example, under KPI 9 something reflecting encouraging greater engagement as per Aim 4 of the Archaeology Strategy.

19 Under each KPI, we have set out the actions we might take at a local (regional) level to deliver our mission. Do you think these actions are the right ones to deliver against the KPI? Can you suggest alternatives?

I suggest changes to one or more of the actions and/or have ideas for additional actions

text box for local delivery comments:

We would suggest it is made clear that these actions are only a sample of what can be done - indeed, perhaps this part of the strategy could be iterative - adding and removing actions as ideas surface which help deliver on the KPIs or when actions or even KPIs are fulfilled.

See our answer to Q17 for context, but reiterated here:
KPI 4
"locally you can" - some clarity required regarding what the goal is for updating a reserves policy?

KPI 5
"Locally you can" could include a call to action for people to advocate for the historic environment to their local decision-makers and representatives. This will become more important as resources dry up and we face the challenges outlined earlier in the Strategy.

20 What structures and mechanisms are needed to oversee successful delivery of the new historic environment strategy?

Text box to explain answer:

The Society welcomes the inclusion of the Scottish Strategic Archaeology Committee as part of the delivery mechanism for this and future strategies. We also welcome the aspiration to consider a regional delivery framework or mechanism for the Strategy - it is our experience through Scotland's Archaeological research Frameworks that regional work elicits greater engagement by local communities and highlights differences in challenges and opportunities for achieving overall national outcomes. We would be pleased to outline our experience in this area.

We also note however, that this regional delivery requires adequate resource and it is clear to us that staff will be required to facilitate and deliver on the multiple actions and benefits of a rapid five year strategy, bringing the heritage sector together around both national and local activities.

21 Participants attending the engagement workshops asked for regional opportunities and mechanisms to help deliver the strategy. Do you have suggestions for how a regional approach to delivery might work?

Text box for regional deliver mechanisms:

We would be happy to outline our experience at delivering ScARF in a regional manner.

22 If applicable, what role would you like to have in delivering the strategy? An example of a role could be taking part in a steering group overseeing delivery of the strategy or taking part in a working group that delivers to a particular priority.

role in delivering the strategy:

We would be happy to continue to help deliver this Strategy through whatever means is considered the most useful by the sector; renewing our participation on the CEOs Forum or its replacement. We already support several of the existing actions mentioned in this strategy, for example raising money for and participating in Make Your Mark, and will be happy to continue to do so. As an independent membership organisation we can help deliver, advocate for, and hold to account others for some national activity, and encourage our members to participate in the local activity.

Impact Assessments

23 What impact do you think the strategy might have on people with protected characteristics? Please add any comments in the text box below.

Impact on protected characteristics - Age:
Positive impact

Impact on protected characteristics - Sex:
No impact

Impact on protected characteristics - Sexual orientation:
No impact

Impact on protected characteristics - Gender reassignment:
No impact

Impact on protected characteristics - Disability and long-term conditions:
Positive impact

Impact on protected characteristics - Race:
Positive impact

Impact on protected characteristics - Pregnancy and maternity:
Positive impact

Impact on protected characteristics - Marriage and civil partnerships:
No impact

How will this effect EDI text box:

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

Positive impact

Text box will this impact businesses or 3rd sector:

There is the possibility of increased competition within the sector due to the reduction of strategic priority areas to three, meaning more organisations will be looking to ensure their activity and funding applications relate to fewer outcomes. This is only mentioned briefly in the BRIA and it is suggested the strategy itself will somehow mitigate the "competing for visitors' spend and for competitive funding pots / grants." Otherwise the impact on the third sector is not really addressed in the BRIA.

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

Not Answered

Text box to describe impact on island communities:

Unknown, but a regional delivery method should highlight and allow delivery on aspirations tailored to the specific challenges in the islands.

26a Has our environmental assessment identified the likely environmental effects of the options?

Yes it has identified the likely environmental impact

26b Do you think there are any additional environmental mitigation, enhancement, or monitoring measures that should be considered?

No

26c Do you have any other comments on the environmental assessment? If so please comment below.

Text box for other environmental assessment comments:

Final comments and follow ups

27 Do you have any final comments on the draft strategy?

final comments text box:

Key statistics:
These are presented in quite a random order, are not source referenced and it is not clear what the reader is to take from them; it might be helpful to order by the points to be made, for example, start with the size and character of the portfolio:
Scotland's historic environment is identified, described and supported by more than 56,000 designations ...
and follow on with the different types Traditional [historic?] buildings are estimated to make up: ...
And then the points to be highlighted:
- how much it costs to maintain the historic environment – condition of housing stock, historic buildings open to the public either in use or as an attraction – is there a conservation deficit?
- who pays to maintain buildings currently (investment)
- GDP from tourism important points but maybe explore detrimental impact of tourism on climate objectives?
- comparison with other sectors is interesting but not sure of the point being made eg and therefore should have more investment in historic environment ...?

Somewhere it would be helpful to identify the problems that the strategy needs to address more explicitly e.g. the condition of the historic environment; the energy implications of the historic building stock; the traditional and forward-thinking [research eg new materials, new ways of doing things] skills that will be needed; the contradiction between tourism and carbon emissions; EDI; post-Covid resilience etc.

While 'Nationally we will' 'locally you can' works well as an inclusive framework we reiterate the need to ensure these are seen as examples - not definitive lists.

The Society recognises the wish to make the strategy inclusive, but this also produced some confusion in the sector for the first iteration and here the various use of "we" for example is likely to also cause some confusion. In this version of OPiT it is clear that HES have been tasked specifically by the Minister to deliver a new strategy as a publicly funded lead body, and it would be appropriate to modify the wording as required to ensure it identifies where HES is the the "we" or the wider sector, or indeed specific parts of the sector, are "we".

Additionally, it would be useful to consider where wording could be changed to reflect the wider historic environment beyond buildings (to include monuments both on land and underwater) and designated assets, and beyond buildings oriented activity (archaeological and historical research for e.g.). The text could also include more mention of the initial tenets of the current OPiT (which are still relevant going forward) to investigate and record, care and protect, share and celebrate - some potential for that is given in our responses, but other opportunities can be found we're sure.

28 Do you want us to follow up with you about this consultation? If yes, please include your email address. We will only use it for the purposes of contacting you about this consultation and any relevant follow up activities.

Yes, I am happy to be contacted in future about this consultation

Email address for consultation follow up:
director@socantscot.org

29 Would you be interested in taking part in a survey that seeks to understand the impact of the cost crisis for the historic environment sector? If so, please provide your email address.

Yes

Email address for cost crisis survey:
director@socantscot.org