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Dear Kate

**Consultation on a draft IfA Standard and guidance for the provision of specialist advice and procurement of services in relation to archaeology and cultural heritage**

I am writing on behalf of the Federation of Archaeological Managers and Employers ([FAME](http://www.famearchaeology.co.uk)), which represents over 50 archaeological practices providing archaeological services to commercial clients throughout the UK.

I must apologise for our delay in responding to your consultation on the revised draft Standard and guidance. We welcome the revised draft, and recognise that many of our earlier concerns have been addressed. I have a few additional comments to make:

I appreciate the difficulty in defining precisely the scope of work covered by the Standard and guidance, but am not fully convinced that the term 'specialist advice' draws a sufficient distinction between consultancy and archaeological advice given by historic environment services. It may be that 'consultancy' is too loaded a term to use, though perhaps 'the commercial provision of advice' might be more suitable. Elsewhere (eg 4.1) the term 'professional advice' is used.

The term 'archaeology and cultural heritage' is used in the title, but elsewhere within the document the term 'historic environment services' is often used. The use of these terms should be internally consistent and clearly defined.

1.1 The meaning of 'within the same organisation or externally' is unclear and, given the reference in 1.1.2, possibly unnecessary.

1.8 Compliance should be with international (eg EU), as well as with national and local requirements.

3.3 'recorded in accordance with recognised professional standards and guidance' rather than 'properly recorded'?

4.1.3 'Priorities' rather than 'wishes'?

4.1.6 Assessment will rarely provide full understanding; a more realistic expectation might be to ensure 'as full an understanding as is reasonably possible'.

4.1.10 is likely to be contentious in its present form. Would it be better to suggest more generally that advisors should satisfy themselves that providers are accredited organisations (eg IfA ROs)?

4.2 In procuring archaeological work, advisors should consider the cost to providers of tender preparation, and ensure that only those providers who will be considered for the work are invited to tender. Providers should not be used solely to obtain a comparator price, with no intention to appoint, or to obtain an alternative for the purposes of fee bargaining.

It is important too for the Standard and guidance to make clear that the advisor retains responsibility for the maintenance of standards, even where work is carried out by a service provider and that it is unacceptable to devolve responsibility (and therefore risk) entirely to the service provider.

4.2.1-4.2.7 list requirements ('musts') for procurement, yet 4.2.2 states that advisors 'should ensure that appropriate contingency...etc'.

4.2.8-4.2.9 refers variously to 'contractors' and 'suppliers' and 'responses' and 'tenders'. Terminology should be consistent and clearly defined; also, the scope of the project and nature of the heritage may not be fully known at this stage, and any limitations in knowledge should be made clear to all parties.

4.2.12 Agreed, though this will of course be subject to the client's agreement.

5.3 Is this a 'should' or a 'must'?

6.2 Again includes a 'should' in a 'must' section.

6.4 Typo.

7.1 First sentence - meaning not entirely clear.

8.3 Again includes a 'should' in a 'must' section.

8.6-8.7 Terminology used here is inconsistent with the rest of the document; the sentence beginning 'Monitoring of archaeological services...' is somewhat unclear – who may they discuss these issues with?

I hope these comments are of help to you, and look forward to seeing the final version.

Yours sincerely

A handwritten signature in blue ink that reads "Adrian". The signature is written in a cursive style and is followed by a long, horizontal, slightly wavy line that extends to the right.

Adrian Tindall MA FSA MifA  
Chief Executive, Federation of Archaeological Managers and Employers