



Federation of Archaeological Managers and Employers
40 Queens Road
Bury St Edmunds
Suffolk IP33 3EP
T: 01284 767681
M: 07715 050318
E: info@famearchaeology.co.uk
W: www.famearchaeology.co.uk

Standard and guidance consultation
Institute for Archaeologists
SHES, University of Reading
Whiteknights
PO Box 227
Reading RG6 6AB
consultation@archaeologists.net

30 January 2013

Dear Kate

Consultation on the draft IfA Standard and guidance for archaeological advice and procurement of archaeological services

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

We very much welcome a Standard and guidance to govern ethics, quality and consistency in the provision of archaeological advice through consultancy and in the procurement of archaeological services.

However, any Standard and guidance in this area must be seen in the context of the new approaches and philosophies for procurement and delivery emerging in the development sector, reflecting the government's *Construction Strategy* (Cabinet Office 2011) and the increasing emphasis on Building Information Modelling and sustainability.

These changes will affect how historic environment professionals engage with the development sector, and will require more formal training in the core competencies needed to implement them effectively.

In our view it is very important that a full and formal process of review takes place following interim adoption of the Standard and guidance, to ensure that new approaches in the development sector are fully reflected in future-proofed documents.

We offer the following specific comments on the Standard and guidance as currently drafted:

The use of 'must', 'should' and 'may' is generally appropriate, though wherever possible they should be cited in descending order - 'must', 'should', then 'may'.

The Standard - the present wording is very unclear, especially the opening sentence; the term 'appropriate expert' needs to be defined; also, should the phrase 'best practice' appear somewhere in the Standard?

Purpose and scope - the terminology needs to be sharper, more consistent, and more clearly defined, eg what is a 'heritage specialist', and how does one differ from 'an archaeologist' or a '(historic environment) consultant'?

1 The generic ethical obligations on members of the IfA are highly applicable, though they do not address the more specific ethical dilemmas facing a consultant in reconciling the needs of the client with those of the historic environment. For example, a consultant may legitimately be required to challenge the requirements of a local planning authority where these are deemed to be excessive or unreasonable, but must achieve this without unjustifiably understating the significance of the assets affected.

2.1.2 Whilst it is clearly preferable that the scope of assessments should consider *all* aspects of the historic environment, there may be circumstances where the client does not wish this to be so, eg they may have a preferred historic buildings advisor. In these circumstances the guidance should require exceptions to be explained and every endeavour be made to integrate the results.

2.1.3 Perhaps the terms 'realise' or 'achieve' are preferable to 'secure'?

2.1.4 Does this mean output or outcome?

2.1.6 This would benefit from further explanation – what kinds of potential solutions (or 'options') are implied here?

2.1.7 This paragraph is rather wordy and over-detailed. It might be improved by relegating the second and third sentences to a footnote, which might also mention display boards, leaflets, booklets and web pages. Should paragraphs 2.1.8-10 be sub-paragraphs of 2.1.7?

2.1.9 Agreed, of course, though these should never be used as a *pretext* for excluding or limiting public engagement.

2.1.12/2.2.10/6.4 References to the RO scheme in these paragraphs seem a little heavy-handed, and it would be unfortunate if this were to undermine the credibility of the guidance. Perhaps the intended message might be conveyed more disinterestedly by deleting the words 'IfA Registered' and adding a footnote reference to the RO scheme? Perhaps surprisingly, reference to professional accreditation seems to be confined to service providers and not those who commission them.

2.2 Procurement – the issue of risk in procurement is addressed in our recently-drafted guidance on the selection of archaeological suppliers (attached).

2.2.3 The term 'contractor' is introduced here, whereas the more general term 'service provider' is used elsewhere.

2.2.4 Is it realistic to suggest that financial considerations should be regarded as *secondary* to that of quality? Perhaps a more realistic message to clients would be that they are equally important considerations in the assessment of *value*.

2.2.10 Would this apply to EH-commissioned projects with strictly-defined overheads? If so, how will this be documented?

2.2.11 Insert a reference to the CDM Regulations 2007; also, The Management of Health & Safety at Work Regulations are 1999, not 1992.

3.4/3.5 Whilst it is reasonable to expect consultants to develop CPD structures for themselves, it may be unrealistic to expect them to encourage service providers to do the same – is this not the role of the RO scheme? Again the detail, including the specific reference to NOS/NVQ may be better in a footnote.

4.4 If this is an attempt to level the playing field, it needs to be more clearly stated.

5. Communication may be with other relevant parties, eg a Principal Contractor. One of the biggest challenges facing consultants, that of reconciling commercial confidentiality with public interest, is not really addressed here.

5.2 What is meant by 'historic environment experts responsible to relevant authorities'?

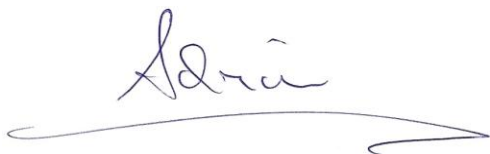
6.2 What is meant by 'stated policies or agreements'?

6.3 'Third party quality control' should exclude QA systems, which are primarily for internal management purposes.

FAME has recently drafted guidance on the selection of archaeological suppliers. This is clearly of relevance to the Standard and guidance, so I append a copy for your reference.

I hope these comments are of help to you.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Adrian', with a long, sweeping horizontal flourish underneath.

Adrian Tindall MA FSA MI(A)
Chief Executive, Federation of Archaeological Managers and Employers