

DCMS Heritage Lottery Fund Policy Directions Consultation:

Icon Response

27 July 2018

The Institute of Conservation, Icon, welcomes the review of the HLF Policy Directions and is grateful for the opportunity to comment on the [consultation](#).

Icon is a registered charity and the UK professional body for the conservation of cultural heritage. Icon raises awareness of the value of caring for heritage and champions high standards of conservation. We represent nearly 3,000 individuals and organizations comprising professional conservators, heritage scientists and many others committed to cultural heritage.

UK-WIDE QUESTIONS:

1. Is there anything in these directions that the HLF should not be doing?

Y/N

If yes, tell us what you think HLF should not be doing and why.

1.1 Policy Direction 1

Icon welcomes the direction to assess the needs of the UK's heritage "in partnership with other funders and stakeholders." This is an important addition recognising the expertise of heritage bodies and the value of collaboration.

However, we have the following reservations relating to the first policy direction:

- A. **Footnote 2.** The footnote unnecessarily singles out the historic environment by referring to "built, cultural, natural and intangible heritage." Built heritage is encompassed by "cultural heritage" and does not need to be specifically highlighted. Such emphasis risks prioritising built heritage over other forms of cultural heritage, in particular moveable heritage, such as objects, collections and internal and external features of a building. We suggest either removing the word "built" or adding the word "moveable" to the footnote to ensure parity of support between different types of cultural heritage.
- B. **The clause "taking into particular account...heritage at risk."** The direction to consider heritage at risk when making grant decisions is welcome. However, any definition and required evidence for proving heritage is at risk would need to consider all types of heritage. Historic England's 'Heritage at Risk' register includes buildings, structures, parks, gardens, conservation

areas, archaeological sites, wreck sites, battlefields and places of worship – but not collections and objects. There are collections and objects at risk of damage and loss that need support to ensure their preservation for future generations. Icon is concerned that the lack of an equivalent official register for moveable heritage will skew grant decisions in favour of the historic environment, simply because there is an official mechanism for proving that built heritage is at risk.

A focus on 'at risk heritage' should not exclude HLF's support for projects aiming to avoid or mitigate risks to heritage. 'At risk' implies that a situation has gone too far and could have been avoided with appropriate action at an earlier stage.

Furthermore, the criteria for support should be based on a number of factors including: a project's ability to allow heritage to deliver the greatest benefit to the greatest number of people, significance and risk of loss.

- C. **The clause "taking into particular account any designation."** Designation can be problematic in terms of collections because it is less common as a marker of heritage value outside of museums. Focussing on designated collections potentially prioritises museum collections over other moveable heritage, such as archives or collections in historic houses.

We urge DCMS to recognise that designation can be a flawed approach. HLF should not prioritise museum applications over other applications, simply because the application relates to a designated collection.

In light of these concerns, we suggest revising Policy Direction 1 to:

"In partnership with other funders and stakeholders, assess the needs of heritage of the UK to inform the awarding of funds, *taking into account factors such as heritage at risk, significance and designation.*"

2. Is there anything that the HLF should be doing that is not covered by these directions?

Y/N

If yes, tell us what is missing and why you consider this important

2.1 Encouragement for Standards

While Policy Direction 7 encourages excellence, there is an absence of encouragement for high standards.

Professional standards provide guarantees that heritage is treated responsibly and ethically, inspiring public trust and confidence. Encouraging standards in funded projects will achieve greater public benefit by mitigating the risk to heritage from inappropriate conservation, preservation, interpretation or research methods and by ensuring that heritage is left in better condition.

As a leading body in the sector, HLF should explicitly champion high standards of practice. We consequently recommend revising Policy Direction 7 to:

"Encourage innovation, excellence and *demonstrable high standards*, and help people to develop their skills," or "*Through the use and development of high standards, encourage excellence and innovation, and help people develop their skills.*"

2.2 Support for the Workforce

A skilled workforce with a sustainable talent pipeline is necessary to the conservation of heritage and the delivery of the positive impact that heritage creates. We believe that the Policy Directions do not sufficiently cover support for this workforce.

Volunteers form a considerable portion of the heritage workforce and the value of their significant contribution is rightfully recognised in Policy Direction 6. However, support for volunteers should be balanced with support for the professional workforce. Proper volunteer management is crucial to maximising the benefits of volunteering to the volunteer, host and heritage. For example, conservation projects involve skilled activities, which require volunteers being trained and supervised by a professional conservator to ensure the project is delivered to a high standard and that the experience is meaningful to the volunteer.

Heritage skills training remains in high demand amongst the professional heritage workforce. Within conservation, the recent closure of higher education courses, coupled with an aging workforce and the uncertainties of Brexit have placed the future of specialist skills at risk. Without access to a skilled professional workforce, communities will struggle to explore their heritage and protect it for future generations. Icon strongly believes that the Policy Directions should reflect this through support for developing the sector's professionals.

We agree with Policy Direction 4, as inspiring "children and young people, awakening their interest and involvement" in heritage fosters our future heritage professionals. However, the scope and diversity of these future professionals may be limited by disproportionate stress on volunteering. Long periods of volunteering have become expected for entrants into heritage, which can impact the possibility and attractiveness of working in the sector. While Icon supports encouragement for volunteering, this should be done with equal encouragement for paid careers in the sector.

In light of these concerns, Icon recommends revising Policy Direction 6 to:

"Support the full breadth of the heritage workforce, from volunteers to professionals." Or "Build the capacity of the heritage workforce by supporting and encouraging volunteers and professionals."

2.3 International Engagement

There is an absence of support for international work. This is in contrast to the Tailored Review and HLF's own Strategic Funding Framework consultation, which considered how HLF can support the sector's international engagement. Support for projects and organisations to promote themselves internationally can increase the sector's sustainability through new income from global audiences and sharing of skills, ideas and expertise. International strands in funded projects would also demonstrate the ability of heritage to contribute to the soft power and cultural diplomacy agenda.

Icon consequently recommends adding the following Policy Direction:

"Support international engagement where appropriate."

ENGLAND DIRECTIONS:

3. Is there anything in these directions that the HLF should not be doing?

Y/N

If yes, tell us what you think HLF should not be doing and why.

3.1 Policy Direction 3

We have reservations regarding the clause "with special regard to those at risk." See point 1.1.B above.

We recommend revising the direction to:

"Encourage the financial sustainability and, where viable and appropriate, the community use of heritage assets in England such as those at risk."

3.2 Creative Funding Models

Icon acknowledges the value of encouraging creative funding models but hopes that these will not be regarded as a replacement for grants, as grant funding will remain vital to the sector.

4. Is there anything that the HLF should be doing that is not covered by these directions?

Y/N

If yes, tell us what is missing and why you consider this important.

4.1 Policy Direction 1

We recommend revising the direction to:

“Encourage the conservation, preservation, presentation, promotion, interpretation, *investigation*, and *accessibility* of England’s heritage, so that it can be appreciated and understood by *current* and future generations.”

We have added the word “investigation” as research is crucial to understanding heritage and underpins its conservation, preservation and interpretation. We have added “accessibility” as this is not explicitly covered but is important to ensuring that everyone has the opportunity to appreciate and understand heritage. We have added “current” in recognition that heritage benefits both present and future generations.

4.2. Encouragement for Standards

There is an absence of encouragement for high standards.

The current Policy Directions in Scotland and Wales include “the need to encourage the use of appropriate professional standards in all projects.” We believe this should also be included in the Directions for England. Professional standards provide guarantees that heritage is treated responsibly and ethically, inspiring public trust and confidence. Encouraging high standards in funded projects will achieve greater public benefit by mitigating the risk to heritage from inappropriate conservation, preservation, interpretation or research methods.

The encouragement of professional standards is central to the UK Government’s Policy Direction for encouraging excellence (Policy Direction 7).