

Heritage Lottery Fund Policy Directions Consultation response

20th July 2018

Our responses are below:

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

Yes.

Direction 1 –

Heritage at Risk is a key area for the HLF as the biggest funder in the heritage sector and it makes sense to prioritise heritage which would be lost. However, each application should still be looked at on its merits. A project which could prevent a building becoming at risk and secure a viable long-term future could be a better use of funding as less money is needed to intervene at an early stage. The HLF should think carefully about ringfencing money specifically for heritage at risk as this might have the perverse incentive of encouraging owners to allow assets to deteriorate to access this funding.

The HLF should use Historic England's at-risk list but also consider buildings on the at risk list of amenity societies such as SAVE and the Victorian Society. Organisations applying for funding should be able to argue that their building is a risk, as risk registers are only updated intermittently and may not reflect emergency situations. The HLF should be flexible in its approach to 'at risk'. It will also be important to consider the community's view of 'need'.

Members, therefore, have mixed views over the inclusion of heritage at risk. Some have welcomed this, however, ICON considers that this places non-built heritage at a disadvantage as an easy way to prove at risk status is through HE's Heritage At Risk register. There is no equivalent register for collections and objects.

It has been suggested that a sensible amendment to account for the above might be: "In partnership with other funders and stakeholders, assess the needs of heritage of the UK to inform the awarding of funds, taking into particular account a range of perspectives on heritage need, designation and heritage at risk."

We note that the inclusion of heritage at risk does not reflect the HLF strapline proposed in its consultation. This has moved from 'distributing money raised by the National Lottery to make a lasting difference for heritage and people in the UK' to 'inspiring, leading and resourcing the UK's heritage to create positive and lasting change for people and communities, now and in the future' with no mention of lasting change for heritage. Nothing in the new policy directions supports that move, and the new statement 1 of the policy directions seems to go in exactly the opposite direction. It would be sensible for HLF's aims to reflect the Directions.

Direction 10 – the Government should not require every project to 'reduce economic and social deprivation'. While this is a laudable aim there will be some amazing heritage projects involving communities saving grade 1 buildings at risk yet are unable to demonstrate this. The criteria should

be at least qualified in the same way as direction 13 'to the extent that this is reasonable to achieve for different kinds of applicants in particular areas'. This will then direct thought to the aim without making it a pre-requisite of funding. When an important heritage asset has major repairs needed to stop it being lost or lose some of its significance, that are never going to be covered by any economic benefit accruing from the repaired asset, the HLF should be able to just fund the repairs to maintain the heritage asset for future generations. The grant should not require additional public benefits beyond an appropriate level of interpretation and education, because in recent years we have seen grants for historic buildings become 60% for the repairs and 40% for the delivery of the public benefits. The public benefits of saving irreplaceable national heritage should be recognised.

Direction 14 - requires money to be distributed to projects only for a specific time limited purpose. This undermines the long-term stability of small organisations which have to repeatedly spend a large amount of time and resource applying for HLF funding. The HLF should move to a similar footing as the Arts Council which is able to award funding for longer periods of say 5 years to enable stability, and to boost sector support and resilience through funding of core cost activities.

**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.**

Yes.

Direction 1 refers to footnote 2 which lists different types of heritage. Mobile technical and industrial heritage should be explicitly included in this list as it is a key area which does not fit under the existing headings.

Direction 8 – It has been suggested that a reference to 'long term' public benefit would be a positive addition here.

Direction 11 -The tailored review said that 'HLF should review its stakeholder engagement strategy carefully' (TR5.32) it is not clear if Direction 11 is intended to achieve this and could be reworded to explicitly mention stakeholders as could be read currently as other funding bodies. It has also been suggested that this direction might include a commitment to 'Consult and work jointly with other organisations...'

Direction 15- the requirement for a clear business plan etc... should be altered to explicitly state that the level of detail required should be proportionate to the amount of funding required so that small organisations run by volunteers are not excluded from applications by the increasing professionalisation and cost of the process. The NCT for instance noted that requiring a business plan for all capital projects is excessive, especially for projects addressing end of life replacement or existing fabric (e.g. church roofs). The requirement for a business plan in these circumstances should be optional, with a minimum requirement for a management and maintenance plan instead. A business plan would be more appropriate instead for capital projects that focus more on re-development, re-ordering or extensions to heritage buildings.

Direction 16 states 'encourage effective use of creative funding models'. This should be altered to say encourage and support effective use of creative funding models'. Much of the sector, especially projects run by volunteers, do not have the skill-set to manage fund raising via creative models without support and training. Our Giving to Heritage project was able to provide this and as a result of c£750,000 of grant funding, heritage projects have raised £3.15m directly attributable to participation in GTH's affordable fundraising training. The evaluation, carried out by Consilium Research, noted that the £3.15 million raised so far will continue to increase year on year as new fundraising strategies are developed and implemented. Without support for training in some form

these funding models cannot be utilised fully. The project ended as Catalyst funding ended, there is certainly still the need and appetite for these programmes to continue.

Direction 17 on increasing digital skills and better collecting of digital heritage material should be altered to include a requirement on the HLF to develop standardised metrics for all its projects which are easily explainable to allow projects to be easier compared and data to be compiled across all projects. In producing these metrics, HLF should work with other funders in the sector and elsewhere to minimise the burden of different funding metrics on those in receipt of funds and to enable the widest possible picture of the impact of funding possible.

Direction 18 could also better meet the recommendation in the Tailored Review that: HLF should make its data available as Open Data and its research as Open Access so that those within the sector and beyond (for example academic researchers) can access the information that HLF collects.

The directions could also consider including:

- support for international engagement as mentioned in the Tailored Review and HLF's Strategic Funding Framework consultation. There are also recommendations relating to this area in The Heritage Alliance's recent [International Report](#);
- support for the professional workforce that is needed to train and guide volunteers and to ensure that heritage is conserved with the appropriate skills;
- Support for building the resilience and capacity of heritage sector organisations, including those who support and enable others;
- A reference to supporting craft skills and apprenticeships. Perhaps the references to young people might include nurturing the potential for careers within the heritage sector.

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.

No

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

No, but item 1. under England should say 'it' not 'they'.

Direction 3 England – it has been suggested that the phrase 'long term' might be added to community use of assets.