

# Public commemoration in Wales: guidance for public bodies

Q1: Thinking about the Guidance text as a whole, do you think it will be useful to public bodies with responsibility for commemorations?

Yes

**Please add any comments you would like to make on the overall document:**

The Association of Local Government Archaeological Officers (ALGAO) is the UK-wide organisation that represents all archaeologists working for local authorities and national parks (employed directly within the authority or by independent joint services). Member local authorities are represented by the senior professional archaeologist whose primary responsibility is to advise that authority, principally through the planning process, on conservation and management of the archaeological resource within its boundaries, and who has been nominated by that authority to represent it. The Association has four key objectives:

To provide a strong voice for local authority historic environment services and promote these within local government to strengthen and develop their role within local government in delivering local, regional and national government policy.

To ensure that local government historic environment services are included within policy (national, regional and local) for culture and education.

To ensure that policy aims to improve the sustainable management of the historic environment.

To promote development of high standards in the historic environment profession

ALGAO:Cymru is the national ALGAO body for Wales. The membership of ALGAO:Cymru comprises archaeologists who work in a curatorial capacity within the four Welsh Archaeological Trusts as well as archaeologists working for Wales' three national parks. Members provide archaeological advice on activities carried out through the planning process, environmental permitting regimes, statutory provisions and other regulatory processes.

Members interact directly with public commemoration through planning and heritage management casework, historic environment records management, thematic research, and overarching remits of public education and engagement.

ALGAO: Cymru strongly supports this timely and comprehensive guidance. It firmly ties in with efforts to increase public involvement in heritage and placemaking, and supports the twin threads of a multi-cultural Wales and distinctive Welsh identity that run throughout national policy. The guidance sets out clearly the range of issues that need to be considered and establishes a structured process for audience engagement and decision-making. However it would be useful to consider adding a flowchart to make the action/decision process more visual. It may be helpful to include a 'review' action, since, as noted in the guidance, understanding and attitudes will change and it is important to emphasise that the process is ongoing and iterative.

A broader range of case studies from Wales (including for example the tangible history of support for Welsh language rights) may also communicate the application of the guidance to public bodies and communities in Wales more effectively.

The consultation indicates that this will be best practice guidance. One possible limitation on its effectiveness is that there is no indication of the envisaged timescale for public bodies to begin to take actions in accordance with the guidance, how a public commemoration review might be resourced, how the guidance might be used in e.g. planning decisions, nor how uptake might be monitored (both in terms of accountability and impact). Clarification on any or all of these points would support public bodies in translating the guidance into action.

Q2: One goal of Wales' Anti-Racist Wales Action Plan is to deliver a balanced, authentic and decolonized account of the past. Do you think that the guidance document contributes towards this?

Yes

**Are any changes needed to the guidance document to help achieve this goal?**

We would encourage the selection of more case studies from Wales relevant to this theme. For example, p.23 refers to Henry Morton Stanley, but misses the opportunity to discuss his role in King Leopold II's brutal rule and his own activities in Africa, and debate around his continuing commemoration in Denbighshire.

Q3: Part 1 of the document introduces the complex issues around public commemoration. Its focus is on the impact of commemorations on communities through subject matter, type, style and location. Does it offer an adequate summary of the issues public bodies should be aware of in making decisions on commemorations?

Yes

**What changes, if any, do you think should be made to this section?**

A section on approaches towards informal commemoration, specifically graffiti and non-commissioned murals, could be useful, as these may be particularly divisive within a community and between stakeholders. As above, it could be beneficial to refer to Wales-specific issues, for example, the Cofiwch Dryweryn sign, and the recent increase in awareness of its importance and adoption as a wider movement.

We agree that the guidance principles could be usefully applied to the use of historic places for temporary and permanent interpretation or events. While historic sites are not primarily commemorative in nature, they are associated with events and people and continue to be a focus for exhibitions and educational and cultural events. The contrasting perceptions of the Edwardian Castles of North Wales as both symbols of oppression and architectural accomplishments illustrate well the potentially divisive legacy of historical events. The World Heritage Site Management Plan 2018-2028 (section 3.4) has balanced text about these contrasting perceptions of the castles and may be useful to include as a case study.

Q4: Step 1 of the guidance concerns inclusive decision making. It identifies some general principles for inclusive decision-making: Do you agree with these principles?

Yes

**Please explain where you consider there to be gaps or omissions:**

We would encourage the use of Cadw's 'Conservation Principles for the sustainable management of the historic environment in Wales' (Cadw/Welsh Government 2011, <https://cadw.gov.wales/advice-support/conservation-principles/conservation-principles>) to support decision-making. This guidance embeds inclusivity and transparency in decision-making alongside the importance of understanding the different values that contribute to a site's significance.

Q5: Step 2 of the Guidance proposes setting objectives for public commemoration in line with the Anti-Racist Wales Action Plan: what other opportunities are there to use public commemoration positively?

While the guidance leads on anti-racism and decolonisation, parts of document mention other areas of representation (LGBTQ+, disability, faith, social status etc) which are also priorities in seeking to achieve equal and inclusive commemoration. There are opportunities to commemorate other significant aspects of Welsh history including efforts for Welsh language rights, and to celebrate achievements of under-represented groups in Wales over and above redressing the legacy of colonialism and slavery. See also the comment below, in relation to suggested positive commemoration case studies.

Q6: Are the criteria for use in decision-making suggested in step 3 of the Guidance helpful?

Yes

**Please tell us what changes, if any, would you like to see in this section of the guidance:**

We would encourage the use of Cadw's 'Conservation Principles for the sustainable management of the historic environment in Wales' (Cadw/Welsh Government 2011, <https://cadw.gov.wales/advice-support/conservation-principles/conservation-principles>) to support decision-making. It is important that the evidential values of existing commemorations, as artefacts, works of art or architecture, and as indicators of social values of the time, continue to be a part of the conversation, and can contribute to future narratives and understanding where change is proposed.

We would highlight the role of the National Monuments Record of Wales (NMRW) and the regional Historic Environment Records (HERs) as information resources, both for learning about people, places and events that may be commemorated, and for recording commemorative places as monuments (e.g. 2.1.4, Sources of formal and informal knowledge). They may be utilised by both public bodies and communities in identifying under-represented or misrepresented subjects and contributing towards improved interpretation. The NMRW and HERs serve as the primary evidence base for planning and other decisions. Collating information generated through new research prompted by the guidance and documenting new commemorations helps to deliver the positive impact of the guidance on future research and placemaking decisions.

Q7: Step 4 of the guidance is about taking action to meet objectives and address the issues raised by public commemoration.

Does this section adequately cover the options open to public bodies?

Yes

**What changes if, any, would you make to this section? Are there any important options available to public bodies not covered sufficiently here?**

This should not be seen as an exhaustive list of options, so as not to restrict imaginative or bespoke approaches. We would suggest adding a caveat to this effect.

In relation to 'changing street/building names' (p.32) a further issue to consider is the preservation of Welsh place-names in line with Welsh Government objectives.

Q8: Do you think the Case Studies included in the guidance are helpful in illustrating the issues and range of options available to public bodies?

Partly

**Please suggest any changes you would like to see to these:**

As this is a Welsh document, we would like to see more case studies from Wales.

Currently the majority of case studies are contentious in nature. In addition to exploring the challenging aspects of existing commemorations, there is an opportunity for the guidance to highlight positive examples, where commemoration has been community-led, enhanced local history or made a positive impact on placemaking. For example, painting post-boxes gold in the local communities of the London 2012 Olympic gold medallists, laying inscribed pavement slabs outside the last homes of WWI VC holders, or living memorials such as trees planted to commemorate Covid victims.

Q9: We would like to know your views on the effects that the draft guidance would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please see answer to Q10.

Q10: Please also explain how you believe the proposed Guidance could be changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

This could be supported by adding a specific section on the use of Welsh in commemoration, and possibly highlighting cases and approaches where individuals and communities are predominantly Welsh speaking. As per the comments about case studies above, it is suggested that case studies relating to Welsh language rights in the past could be included.

## Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

**Name** Association of Local Government Archaeological Officers  
(ALGAO):Cymru

**Organisation (if applicable)**

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If you want to receive a receipt of your response, please provide an email address.

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