



Historic England

To: [certification.cfe@cabinetoffice.gov.uk](mailto:certification.cfe@cabinetoffice.gov.uk)

## **CONSULTATION RESPONSE: COVID-Status Certification Review - Call for Evidence**

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Digital, Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

We welcome the opportunity to submit a response to this Call for Evidence on the following points. We have confined ourselves to those few areas which are directly relevant to our locus and to our heritage sector; we do not comment here on matters such as privacy, ethics, discrimination, legal and medical considerations which apply to the whole of society, and which the Government will be taking into account in making its decision, for example, we do not comment on the impact of opening heritage sites only for those who have a certificate.

### **Question 1. Which of the following best describes the capacity in which you are responding to this call for evidence?**

k) Other: We are a non-departmental public body.

### **Question 2. In your view, what are the key considerations, including opportunities and risks, associated with a potential COVID-status certification scheme?**

Heritage sites are in most respects no different from non-historic ones and, wherever possible, standard approaches should be adopted across *all* sites to minimise confusion for visitors. However, in a few instances, there may be some heritage-specific differences where additional considerations need to be taken into account.

Historic England, The Engine House, Fire Fly Avenue, Swindon SN2 2EH  
Telephone 01793 44 5050 Facsimile 01793 41 4707

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Subject to the caveats in our introduction, our key consideration is to ensure that heritage locations, including workplaces in historic buildings and heritage visitor attractions, can reopen as fully, quickly and as safely as possible. This goal benefits both the economy, but also safeguards the historic buildings and structures themselves, which might otherwise be left empty and more prone to undetected events such as floods/ vandalism etc. We believe that a Covid certification scheme may help achieve the goal of getting heritage locations open as soon as possible.

c) Operational/ delivery considerations:

There are some considerations specific to the heritage sector - these mostly relate to enclosed rather than to outdoor sites. For example, when opening up a building using a certification scheme, problems might occur if there are attempts to mix groups who are on the “normal” tiered regime, with what may be a “fast-track” group who have a certificate. Difficulties may occur because historic buildings and structures may have more constrained spaces and narrow corridors than modern buildings, and they may not be capable of being fully ventilated.

It is worth noting that in normal times, school children often visit heritage attractions as part of the school curriculum, as well as high numbers of more elderly people.

It would be up to individual employers or visitor attractions to decide whether to try and open up to both unvaccinated people such as children, alongside certificated people, but they may end up having to ban certain groups in order to open up quickly, or open up at different times with cleaning regimes in between, or may decide they can only go at the slower-pace tiered system anyway.

Some heritage locations, including places of worship, may need to continue to close off some constrained areas such as small chapels until everything is able to fully reopen.

We also acknowledge that some sites (e.g. those which are opened by keyholders and then left unattended) would find it difficult to check on certification, and therefore may not be able to open at all if the scheme was mandatory.

In conclusion, despite these possible difficulties, a certification scheme may enable some businesses and attractions in heritage locations to be more flexible and open up more quickly. That is to be welcomed, even if not everyone (businesses, charities and others) could take full advantage of it.

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**Question 3. Are there any other comments you would like to make to inform the COVID-status certification review?**

Relatively high numbers of older people visit heritage attractions on a regular basis. Many of these will not have technology such as a smart phone, so the certification scheme will need to take account of this. Additionally, many heritage sites are in remote areas where network coverage is poor, and again, the certification scheme would need to take account of this.

Amanda Chadburn  
Senior Policy Adviser,  
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