<u>**HERITAGE LOTTERY FUND CONSULTATION 2018**</u>

HISTORIC RELIGIOUS BUILDINGS ALLIANCE RESPONSE

The Historic Religious Buildings Alliance (HRBA) is an independently-funded group within The Heritage Alliance. The members of the HRBA include faith groups and charitable trusts who between them maintain almost all listed religious buildings in the United Kingdom. To put this in context, there are about 20,000 listed religious buildings in the UK, of which some 60% are owned by the Church of England.

HLF has played a major role in supporting this country's heritage, including historic religious buildings, and its continuing engagement is crucial to our heritage. We estimate that in recent years approximately 10% of HLF funding has been invested in places of worship, making a significant difference to this aspect of our heritage.

It is because of HLF'overridingly-important role as funder that HRBA and others are taking such a keen interest in this strategic review, and in HLF's plans for the future. However, as is well known, many of our organisational members do not accept Lottery money on principle, and will not, of course, be responding to your consultation.

We have numbered the questions for ease of reference.

PART 1: HLF'S ROLE NOW AND IN THE FUTURE

1.1: Do you agree or disagree that HLF's role in the future should be to inspire, lead and resource the UK's heritage to create positive and lasting change for people and communities?

Strongly disagree

1.2: Why do you say that?

We agree that the HLF should **resource** the UK's heritage. We have the following concerns about other aspects of the new strapline:

1. The proposal talks of **'inspiring the UK's heritage'**. To our mind, this makes no sense - heritage cannot be inspired, only those who look after it or who might enjoy it. Inspiring people will we very much hope be a positive side-effect of HLF's activities, and is desirable in itself, but is not something which should form a major part of HLF's strategy as that implies greater management focus and resource allocation than it deserves.
榲2. **We disagree with the suggestion that HLF should 'proactively' 'lead' the UK's**
2. **We disagree with the suggestion that HLF should 'proactively' 'lead' the UK's heritage**. We cannot see that this was suggested in the Tailored Review (TR). Rather than lead the sector, the role of HLF is to distribute National Lottery money and to do so strategically (TR 3.13 – 3.27). Indeed, the Review commented that 'HLF expertise predominantly sits in grant giving and project management' (TR3.4). For it to use its position as 'near monopoly funder' (TR 3.16) to 'lead' the sector would be to 'encroach on the roles of other heritage bodies by veering into direct policymaking or to set priorities that may shape the heritage sector' (TR 2.12). The Tailored Review sees government setting priorities for heritage (Recommendations 1–4), and expecting that HLF should build on 'knowledge of the heritage

sector's needs' (3.13). The suggestion that HLF should 'lead' the sector does not have our support.

3. **We strongly disagree with the shift away from 'making a difference to 'heritage *and* people'** (our italics) to creating change for people and communities *only*, with no mention of making a change to heritage. We do not believe that this correctly assesses the needs of the national heritage.

The Tailored Review (TR) explicitly raised the question of whether HLF should 're-prioritise pure heritage conservation' as against, for example, direct community outreach projects (3.23–25). And it was clear (our italics) that '*This will be a balance for HLF to consider carefully*'. It then emphasised the need for the HLF Board to 'recognise the needs of the sector' and 'the needs of heritage'.

We are disappointed not to find this question of where the balance lies explicitly addressed in this consultation. We hope that HLF will follow the recommendation of the TR and consider this balance carefully and explicitly. (The later section on 'at risk' brushes against the question, but as it does not give a prior definition of this term, is not as helpful as it might have been.)

Our view is that at a time of financial stringency, the most urgent need is 'heritage conservation' to ensure that built heritage assets are still available for future generations (see TR 3.7, p. 30). The roof fund demonstrates that simple schemes can meet 'the needs of heritage' and the enthusiasm for the scheme demonstrated it 'recognised the needs of the sector'. Extraordinarily it also had beneficial unintended consequences by way of community engagement.

We think that this strategic strapline does not recognise 'the needs of the sector and the needs of heritage', 'in the context of a very uncertain future funding environment for heritage in the UK', as suggested in the TR. We believe there should be a rebalance in favour of heritage conservation, and would wish HLF to explicitly consider this, as recommended by the TR.

4. Finally, the new statement of policy should be subject to the Government's new **Policy Directions**, which will themselves be subject to consultation. We do not understand how HLF can ask for approval of this new statement in advance of new Policy Directions.

1.3: Thinking about the different aspects of HLF's role, other than grant-giving, please select and rank up to 5 that you think are most important for HLF to do.

4   ☐ Building strategic partnerships and collaborations
1   ☐ Attracting other public or private financial support for heritage
3   ☐ Support the capacity and resilience of the heritage sector as a whole
2   ☐ Sharing learning
      ☐ Advocating for the value of heritage
      ☐ Supporting organisations within and beyond the heritage world to come together, collaborate and network
      ☐ Inspiring and promoting innovation in business models
5   ☐ Helping people and communities to meet their aspirations

1.4: Why do you say that?

We agree with the Tailored Review that the HLF expertise 'predominantly sits in grant giving and project management' (TR 3.4). HLF works best when it enables groups to care for the heritage that matters to them, allowing those groups to decide what their priorities are, and not seeking to dictate the directions that such groups take. We wish HLF to support heritage organisations on the ground to build resilience and capacity because these groups are the ones who look after heritage.

Those groups act as advocates; if HLF becomes an advocate, then there is the risk that as a 'near monopoly funder' (TR3.16) its decisions as to what to advocate will shape the sector.

PART 2: STRATEGIC PRIORITIES FOR HERITAGE AND PEOPLE, + MEASURING OUR IMPACT

2.1: What do you think are the most important heritage needs or opportunities that investment from the National Lottery should address in the UK?

We believe that historic places of worship should be included amongst the most important heritage needs and opportunities faced by the UK. We base this on the reasons outlined in the DCMS Heritage Statement (HS).

The HS (page 13) said that 'places of worship, covering all faiths, are among our finest historic buildings.'

They contribute to local and national place-making. As the Heritage Statement says: 'They are an integral part of our national identity and of their local communities.'

The HS described Church of England (CofE) churches as 'exceptional buildings'. It is worth repeating the well-known fact that CofE buildings form nearly one half of England's highly-listed heritage buildings, and that in the UK as a whole there are about 20,000 listed places of worship.

Furthermore, as pointed out by the HS, places of worship 'are living buildings and a resource for their local communities'. It went on to explain that many Church of England churches 'remain active community hubs, providing organised activities to address a range of social needs, including loneliness, homelessness, unemployment and family breakdown'. We would add that this is true of the very many faith groups.

The HS mentioned the high level of volunteering involved: 'many thousands of people commit hundreds of thousands of hours to caring for them, and many more enjoy the unique sense of community that they provide.'

The HS pointed out that Church of England buildings 'face challenges in sharing and spreading good practice whilst at the same time ensuring sustainable maintenance and funding'. We believe that this is true of the historic buildings of many faith groups.

Thus, for the reasons outlined in the DCMS Heritage Statement we believe that historic places of worship should be included amongst the most important heritage needs and opportunities faced by the UK.

2.2: And what do you think are the most important heritage needs or opportunities that investment from the National Lottery should address in your region or country?

Same as previous question

2.3: Should HLF give priority to heritage considered to be 'at risk'?

Yes

2.4: And how would you define heritage that is 'at risk'? Please give as much detail as possible in your answer?

Heritage at risk should be prioritised because the loss of heritage is irreversible.

For the built heritage, we find Historic England's approach very useful. We do not see any reason to start from scratch devising a new definition.

We would encourage HLF to work with HE to keep HE's list up to date as regards historic religious buildings, as happened until very recently. We are concerned that public investment in creating that list will be eroded without such co-operation.

For artefacts such as stained glass, monuments, etc, a similar approach would be effective – that is, one that concentrates on the condition of the artefact and its likely future.

2.5: How should HLF take account of different priorities for heritage in England, Northern Ireland, Scotland and Wales within a UK-wide framework?

Not answered

2.6: Do you agree or disagree that HLF should address under-representation in our funding of geographical areas that have received least funding in the past?

Tend to agree

2.7: Why do you say that?
It is important to understand why some geographical areas are under-represented. It may be that under-represented areas have particular barriers which make it less likely they will apply for heritage funding. We believe the focus should be on ensuring accessibility not equality of distribution, without making equal geographical distribution the main focus.

2.8: Do you agree or disagree that HLF should address under-representation in our funding of geographical areas that experience deprivation?

Tend to agree

2.9: Why do you say that?

This is a complex policy area. We think the policy aim should be for the needs of heritage to be equally likely to be met, and the benefits of heritage equally likely to accrue, whatever the nature of the area in which that heritage is located. We would strongly support HLF continuing to work on the demand-side, for example continuing to encourage and help deprived areas with the grant application process.

2.10 Are there groups you think we ought to prioritise in our Strategic Funding Framework?

Other – HLF should prioritise any group that lacks the capacity or confidence to apply for funding to help make better use of heritage to deliver public benefits.

1. The Tailored Review recommended that HLF develop a 'coherent strategy' for those that do not have the capability and capacity to submit an application without significant support (TR3.108). This should be a priority.

2. It also recommended a 'coherent strategy' for underrepresented groups. A coherent strategy should, we believe, be based on evidence of under-representation, not simply be a listing the public sector Equality Duty. However, if the public sector Equality Duty is to be the basis for groups that HLF focus on, then it should include religious groups.

The cost and difficulties of implementing any strategy should be proportionate to its benefits.

3. Any demographic strategy must take into account the geographic coverage of each individual project, taking account of the local demographics, and not impose demographic engagement based on national statistics.

2.11 How could HLF respond to any specific barriers you know these groups face in applying for funding to support their community's heritage?

The feedback from across our membership has always been that it is not so much the different funding streams that require simplification, but the forms themselves. Many of our members report finding the application forms too long and too complex, certainly when compared with other funders.

2.12: How could HLF respond to any specific barriers you know these groups face accessing heritage opportunities?

Not answered

2.13: How could HLF most effectively support all organisations to reach a wider range of beneficiaries?

We can only speak for historic religious buildings.

We would hope that HLF would continue to recognise that an applicant might already be doing well at reaching a wide range of beneficiaries, and that it would be unreasonable to expect a dramatic increase in this regard.

Historic religious buildings are not usually paid-for visitor destinations who can influence their audience with targeted marketing. In practice, their reach is within a geographical or cultural community (including hard-to-reach communities). Nor can historic religious buildings easily monitor the diversity of their ad hoc walk-in visitors.

In practice, because they are embedded in a geographical or cultural community, historic religious buildings have often proved very effective at reaching out to the young (for example through schools visits and activity clubs), to the old and/or lonely / and/or hard to reach (through lunch clubs, language schools etc), to those suffering financial deprivation (though food banks, debt counselling etc), and to those suffering mental ill-health (places of worship tend to offer an unconditional welcome).

In some cases, the use of a website may be a viable way of extending the reach of a historic religious building beyond their immediate community, but only if there are the resources in place to keep it up-to-date and working effectively. A website is only as good as its latest update. Furthermore, a website does not provide the degree of human contact provided by being physically present (an online lunch club is hard to imagine). Nor does it provide the sense of wellbeing that actually being in, or involved with, a heritage asset can provide, but a picture of that same asset on a screen does not.

We therefore believe that HLF should continue to take into account the extent to which the congregation of a historic religious building is already reaching an appropriate range of beneficiaries; and where it is appropriate HLF can best help congregations to reach a wider range of beneficiaries by encouraging them to build on their reach within their geographic or cultural community.

2.14: How could HLF most effectively support organisations to collect better data on who is benefiting from heritage projects?

We can only speak for historic religious buildings.

As mentioned above, historic religious buildings are not usually paid-for visitor destinations with turnstiles etc. They cannot easily monitor the diversity of their ad hoc walk-in visitors.

We therefore believe that HLF can best help historic religious buildings better to collect data on who is benefiting from a heritage project by focusing on one-off events such as talks, tours, visits etc where data can be collected. Providing a simple template for questionnaires might be helpful. The requirement for data collection should be proportional to the size of the grant and the degree to which a significant change is required in the range of beneficiaries benefiting.

2.15: Do you agree or disagree that HLF should focus on these nine outcomes?

Tend to disagree

2.16: Why do you say that?

1. We appreciate the work that has gone into simplifying the previous set of outcomes. However we fear that focus on all these elements in open programmes could detract from what should be the priority (in our opinion), ie caring for the heritage, represented essentially by Outcomes 1, 2 and 4. Furthermore, some of the outcomes are nebulous, hard to quantify in application and measure in delivery. These concerns are particularly true of the new Outcome 5, and Outcome 8.

2. We are especially concerned about the well-being outcome, which we suspect will be hard to measure both before and after a project. Furthermore, it seems very often to be the consequence of a mediating output or outcome – for example, greater well-being through volunteering. Because it is loosely defined and comes about as a result of other project impacts, we suspect that in practice 'well-being' will be tacked on as a hoped-for consequence of those other impacts. This will add extra work to all applicants, and could distort the weighing up of one grant application against another. We would be even more concerned if projects were shaped in order directly to produce well-being, as this would be steering the use of heritage assets in a particular direction, and would mean that HLF is effectively setting policy.

3. We believe that 'heritage will be in better condition' should be given very much greater weight than the other outcomes, for the reasons outlined earlier. By focusing on the outcome that 'heritage will be in better condition', HLF will be helping to ensure that the heritage continues to be in existence for future generations to enjoy. Once it is gone, it is gone.

In the case of historic religious buildings, we believe that without such a focus on helping congregations with major repairs, the heritage will steadily be lost. It is known that such major repairs are very infrequent for any particular building (typically once every few decades) but can be hugely expensive. If left for too long, the building deteriorates and is eventually lost.

Furthermore, the evidence from the Roof Repair Fund is that repairing the fabric of places of worship leads to unanticipated positive consequences of greater community engagement by the congregation, through a number of credible mechanisms.

Thus, the evidence known to us supports a focus on fabric repairs, implying that for this aspect of heritage, HLF should concentrate on the outcome that 'heritage will be in better condition'.

2.17: Do you have any comments on how people might gain greater well-being through heritage projects?

If there are 'established definitions and measures available' then it will be necessary to set these out very clearly in your guidance, as it is our experience that the general applicant would not know what these are, nor how they might articulate them.

Our members have found that for those participating in projects associated with historic religious buildings, there have been considerable gains - self-esteem, confidence, enjoyment, a re-kindled passion for heritage, making friends, discovering new skills etc. It will be interesting to see how these might relate to 'well-being' – in our view they are mediating outcomes for well-being, and probably themselves easier of prior definition and subsequent measurement than is well-being.

PART 3: STRATEGIC INTERVENTIONS AND PARTNERSHIPS

3.1: Do you agree or disagree that HLF should focus on putting heritage at the heart of place-making across the UK?

Tend to agree

3.2: Why do you say that?

The DCMS Heritage Statement said that places of worship 'are an integral part of our national identity and of their local communities.' The buildings themselves often form a visual focal point within the landscape and built environment, alongside their intangible role in place-making (their sense of continuity with the past, and their potential to be a hub for activity and shared community endeavour). Places of worship are well-placed to continue that role, and develop it.

One advantage of this approach is that it would allow those aspects of historic religious buildings which are not easily counted to be given weight. To give just one example, we have been concerned in the past that our members have found it difficult to employ the townscape impact of a historic religious building in support of a grant application, because it has been inherently difficult to quantify (there are no visitors to count).

Some of our members have particular expertise in regeneration and using religious buildings for placemaking and will no doubt respond more fully.

3.3: Who would be the most appropriate partners for HLF and what should their contribution be?

Not answered.

3.4: Should HLF fund more commercially focused approaches to support projects with a focus on enterprise and skills?

Not answered.

3.5: Why do you say that?

Our individual members have considerable experience in this area and are best placed to answer.

3.6: Do you have any suggestions about how HLF can best work with other organisations to support the viable reuse of existing underutilised buildings?

Not answered.

3.7: How can HLF best support heritage organisations across the UK to become more enterprising and financially sustainable?

2 .   ☐ Provide funding to individual organisations to achieve strategic organisational change

1.   ☐ Provide funding for testing new ideas, such as the viability of new commercial activity

3.   ☐ Other

3.8: Why have you chosen these as your top three?

Other - provide funding to assist small organisations in establishing viability for their ideas for the use of a heritage asset, eg options appraisal/feasibility studies, as a first step in the process of determining a sustainable future for a building, even before establishing what organisational change might be needed. Similar to option 2, but we feel it shouldn't be limited to new organisations.

3.9: What is your organisation's experience of non-grant finance (e.g. loans, equity investments, crowd funding)? Please choose the description that best reflects your current position.

Not answered

3.10: What, if anything, would make your organisation more likely to take up non- grant finance such as loans or equity investment? Please select all that apply.

Not answered

3.11: Why do you say that?

Our members have differing needs in this area which we hope they will express to you. One point of commonality is that the very great majority of congregations do not 'own' their building in the conventional sense (it is held on trust, often within legal or statutory constraints) so cannot offer security.

We agree with the Tailored Review that non-grant finance should only be seen as one tool in the box and not as a replacement for grants (3.119).

3.12: What support, if any, would be most useful for your organisation in helping you to access non-grant finance? Please select and rank your top 3.

Not answered

3.13: Why do you say that?

Not answered

3.14: Should HLF provide match funding for organisations who use crowd-funding to win support for their heritage projects?

No

3.15: Why do you say that?

We see no reason why money raised by crowdfunding should be treated in a different way from money raised by other methods, such as from congregations' own pockets or from other fund-raising.

To treat it differently would effectively be to steer organisations in one direction, rather than letting them decide what is the most effective way of raising funds and achieving their other goals. Applicants would move straight away to crowd-funding, even it was less efficient or had fewer social benefits than traditional fund raising. Or they would game the system by approaching the same people as they would have for donations and tell them to use the crowd-funding mechanism.

One pool of potential donors (those who do not have the technology to join in crowdfunding) would be disadvantaged.

Privileging crowdfunding differently would distort the 'market' in fund-raising and would be an example of HLF setting policy. We feel that HLF should allow those who own the funding problem to decide how to raise the money, not subsidise different methods on a point of principle. HLF should not impose its own views on the best way of raising money.

We have no objection to HLF pointing out to applicants the relative advantages and disadvantages of crowd-funding and giving advice on it.

3.16: How could HLF better support organisations to use digital technology to:

a) Create and make available high quality digital content

We expect our members may have direct feedback based on their experience. However, one suggestion that we have is that HLF could provide more case studies showing what other applicants have done, perhaps a special section on the website to highlight good ideas.

b) Increase engagement with heritage
Not answered

c) Diversify audiences for heritage
Not answered

d) Make heritage more inclusive
Not answered

e) Increase organisational efficiency and resilience
Not answered

f) Build the digital literacy of staff, volunteers and trustees/governors
Not answered

3.17: How could HLF help organisations ensure that their digital content is accessible to the public now and safeguarded for the future?
Not answered

3.19: How could HLF support the heritage sector to engage internationally and deliver benefits for the UK? Please select all that apply?

Other – not answered

3.20: Why do you say that?

Not answered

3.21: Should the HLF involve the public in decision making?

No.

3.22: Why do you say that?

Deciding who gets a grant depending on public decision-making favours groups who are good at publicity and encouraging vocal backing, not necessarily the groups whose project most needs or deserves support. This approach would add yet another burden to those caring for heritage, the burden of competing with other projects for local support, and we fear that smaller groups would suffer.

We believe that a professional, impartial and systematic approach should continue to be taken in deciding how HLF's limited funding pot is allocated to maximise its impact on the country's heritage. For example, the use of outcomes allows just such a cool and considered assessment, comparing one application with another in an attempt to get the most bang for HLF's buck. We are clear that the allocation of funding should continue to be done within the context of the HLF Board setting and then overseeing its strategy.

3.23: What options for involving the public in National Lottery Funding for heritage projects should HLF explore? Please select all that apply.

Not answered

3.24: And what level of grant should we consider this for? Please tick the level of grant for each option.

Not answered

PART 4: OUR PORTFOLIO

4.1: Do you have any comments on our proposal for an open grant programme for all types of heritage project?

As a general comment, one advantage of dedicated programmes is that HLF's strategy is easily operationalised through ring-fenced funds for a particular class of heritage asset, with a choice of outcomes suited to that asset and which encourages the right sort of competition between applicants.

If open grant programmes are to be used for all types of heritage project, then the most careful consideration will need to be given to the choice of outcomes for each open programme and how applicants offering different outcomes will be compared.

From the point of view of historic religious buildings:

1. **We regret the loss of a dedicated grant scheme** providing ring-fenced money. This allowed HLF to distribute its funds strategically, and provided a tailored process for applicants. The clear parameters of the scheme gave transparency, and ensured a level playing field.

2. We are pleased that HLF have **guaranteed funding** to places of worship for a second year. We believe there is a strong case for this to be extended, and to apply to grants for repairs. This would help HLF to focus its funding strategically on a particular class of heritage asset with known issues.

3. We would wish '**heritage will be in better condition'** to have high priority within any open grant programme. The best plans for learning, participation and engagement with a wide range of groups would risk being rendered null and void if the heritage asset that the activities depend on is not in better condition.

4. We note that that the Tailored Review said that '**HLF and HE should work together more effectively** to strategically support the sustainability of the sector and of built heritage assets, particularly in order for HLF to capitalise on HE's specialist expertise **to ensure that lottery funding is invested in built heritage projects that will have the greatest impact**.' (TR 3.7, p. 30) We welcome this recommendation, and believe it applies to historic religious buildings as much as any other built heritage. We look forward to hearing how HLF and HE intend to work together to fulfil the Government's expectation in this area, and how the proposals will relate to the mechanics of Open Programmes. We would be happy to engage with you as you consider this, if that would be helpful.

4.2: Do you agree with the proposal that we increase the ceiling for single-round grants from £100,000 to £250,000?

Yes

4.3: Why do you say that?

There are numerous projects, particularly those focusing on built heritage, where the slightly simpler Our Heritage style programme would be more appropriate and more accessible, especially for smaller groups, for whom the multiple outcomes of Heritage Grants, and the two-round process are extremely daunting. Increasing the threshold would make funding more accessible and allow better-planned and more cost-effective projects.

From the point of view of historic religious buildings, this would bring the programmes in line with the now-defunct GPOW upper limit of £250k. We are aware of disadvantages (there would be the risk of unforeseen costs that are currently mitigated by having a development phase, for example), but on balance support the proposal.

4.4: With a lower budget, should HLF set an upper limit on awards?

No

4.5: If you do think HLF should set an upper limit on awards, what should that limit be?

Not answered

4.6: Why do you say that?

There will always be projects that by their very nature require a more-than-usually substantial investment. The funding landscape has changed – there simply aren't the other funders out there, and reliance on private philanthropy is risky. Projects that seek substantial funds are judged to a very high standard and held to a high level of accountability, and rightly so. They have the potential to deliver a huge impact for the heritage. These very large projects are also very few and far between. Having the flexibility to respond to such projects according to need, might mean the difference between the corresponding safety or loss of heritage or immense value.

4.7: How should HLF strike a balance of offering larger and smaller awards?

HLF should give equal weight to smaller and larger grants.

4.8: Why do you say that?

Historic religious buildings require grants of various sizes. We are not aware of any grounds for prioritising one size of grant over another.

4.9: What needs or opportunities should HLF prioritise for strategic campaigns in the early years of the next Strategic Funding Framework?

We would expect that analysis by HLF of their grant-making would show where demand has greatly outstripped supply, and that therefore there might be an opportunity for focusing their attention on these areas.

In the case of historic religious buildings, the tremendous oversubscription to the Roof Repair Fund shows that there is a huge need for a simple, streamlined grant programme that targeted a single issue, and there were many disappointed applicants for this simple and effective fund.

4.10: Do you see benefits in HLF offering fixed rate grants for certain types of project through strategic campaigns?

No

4.11: Why do you say that?

It would force applicants to tailor their application in ways that could be distorting and unhelpful to the heritage in question.

4.12: We currently require partnership funding (in cash or in kind (e.g. through free use of a venue)) to be contributed by grantees at the following minimum rates. Should we make changes to this approach?

Yes – require more partnership funding

4.13: Why do you say that?

Feedback from our members suggests that in practice it is very rare for grants to be offered at the higher end of the threshold, and that, in assessment, the level of contribution from the applicants is taken into consideration as a demonstration of their commitment to the project. Increasing the minimum would be more realistic, and more transparently reflect actual decision making.

In the past, we have observed that a dedicated scheme for places of worship which expected a substantial contribution from applicants (who were charities) worked well, as the size of contribution was assessed according to the resources of the applicant. This reduced the demands on the grant programme. We are not clear whether this would work for a non-dedicated scheme.

4.14: How should the HLF achieve a balance between offering open funding opportunities and strategic interventions through campaigns, partnership programmes or innovation funds?

HLF should give equal weight to investment in open funding and strategic interventions.

4.15: Why do you say that?

The needs of heritage (including historic religious buildings) are relatively stable, long-term and predictable. A significant portion of HLF's funds should be allocated via stable programmes designed to meet those foreseeable needs, allowing organisations to plan ahead. HLF can from time to time allocate funds for strategic programmes, always in discussion with the wider heritage sector.

4.16: Do you agree or disagree that all projects should embed environmental sustainability and that this should be part of our standard criteria for the assessment of applications?

Don't know

4.17: Why do you say that?

This is laudable in a general sense, and certainly for new-build elements of a capital project, it can be implemented.

However, when it comes to historic buildings this is a highly technical area, and may anyway be subject to the restrictions of listed building consent. Some of our members have deep expertise in this area, others less so.

We fear that if this were part of any standard criteria assessed in a tick-box fashion by non-experts then it might disadvantage historic buildings, which form a significant proportion of the country's heritage assets. The overarching need is for each application to be have been developed and reviewed by an expert professional, and we are open minded as to the process by which that is achieved so long as the result is straightforward, cost-effective and non-bureaucratic.

4.18: How should HLF ensure applicants follow best practice on environmental sustainability and address the potential negative impacts of climate change?

In designing their approach, HLF will need to work closely with expert organisations regarding eg, the energy performance of historic buildings, and the most environmentally sustainable methods of historic buildings conservation.

PART 5: IMPROVING THE EXPERIENCE FOR CUSTOMERS

5.1: Which of the following resources do you think would be most helpful to applicants preparing proposals and applications? Please rank the top three most helpful.

1. ☐ Application guidance documents and help notes
2. ☐ Video guides to navigating the online application process
   ☐ 'Top tips' short videos from successful grantees
   ☐ Digital peer to peer support through an online community
   ☐ Online toolkits and guidance on specialist topics
   ☐ Webinars on specialist topics
   ☐ Self-assessment tools/or checklists to identify 'project readiness'
3. ☐ Tailored advice, such as a telephone helpline and/or chat facility
   ☐ Other, please specify

5.2: Why did you give these rankings?

There is certainly a place for some of the digital tools mentioned above, but they are reliant on there being good internet access, which is still far from universal. For that reason, we feel that the more 'old-fashioned' methods of a voice on the end of the phone and a form that can be printed off and read, will always be the most useful resources. Self-assessment checklists have their uses, but we suspect that even with them in place, it wouldn't be seen as a replacement for actual advice.

5.3: Do you agree or disagree that HLF should introduce an Expression of Interest screening stage for larger grants?

Tend to agree

5.4: Why do you say that?

We support this idea; as the competition for grants becomes more competitive, it really would help applicants to refine their plans without, over committing their resources. Presumably those unsuccessful would be offered detailed feedback.

We assume that this would be in addition to, and not in lieu of, the Project Enquiry Form.

5.5: In your opinion was the amount of work involved in preparing an application proportionate to the size of grant you applied for?

Not answered

5.6: Why do you say that?

We have not applied for a grant.

5.7: How could HLF simply its application processes to ensure they are as accessible as possible.

Feedback from our members has repeatedly emphasised the need for a more simple and straight-forward application form. This is mirrored by the comments in the Tailored Review (TR), paragraphs 3.07–3.11. It was suggested there:

> 'that HLF streamline its processes to take account of the capacity constraints of smaller and community based groups. This should include revising the language used on the application forms to remove as much heritage and project management 'jargon' as possible. Flexibility is something that HLF will need to consider as it redesigns its application processes…This might include developing a structured system of proportional application processes which are sensitive to the nature and size of grant requested, as well as the type of applicant'.

We support all these suggestions and are happy to work with HLF in exploring and trialling simplified application forms.

In general, although we can understand the logic of using an 'Outcomes' framework to try and encourage groups to articulate the difference that HLF funding will make, it is often an exercise in trying to fit a square peg into a round hole. A simple form that allowed applicants to tell the story of the project in 'what', 'who', 'why' and 'when' terms would be far more straight-forward. HLF should consider trialling much simpler forms; this would overcome many applicants' difficulties.

We are concerned that telephone or online interviews require specific skills and will favour those who are accustomed to making their case in this way, and are familiar with the language of outcomes, etc. We think too that these approaches may well further encourage the use of consultants either to undertake the interview or to give coaching. Introducing new processes such as telephone interviews will introduce an additional form of assessment by the back door. As HLF will know, carrying out interviews in a way that allows decisions to be explained later is an activity requiring specialised training.

For the above reasons, we are very cautious about the interview proposals and would strongly encourage HLF to focus its innovation on simplifying the application form. If it is decided to introduce telephone interviews, then we believe there should be time-limited pilot, developed in consultation with the sector, and subject to a rigorously monitored trial.

5.8: How could HLF use digital technology to improve the customer experience for applicants and grantees?

Given that there are still large parts of the country where mobile and internet connection is virtually non-existent, and even filling in the application form online can be challenging, we would question how much impact using digital technologies might have for some constituents.

One way of achieving a small, simple gain might be an automated text message that comes through to let applicants know that forms have been submitted successfully (might be quicker than waiting for an email to come through, and possibly more chance of it being received rather than the email going to a spam bin).

Improving the search function on the HLF website would enable people to get to the sections they wanted more quickly. It's not the most navigable of websites.

5.9: How could HLF make its processes for managing your grant post-award more efficient?

Not answered

PART 6: FINAL COMMENTS REVIEW AND SUBMIT

1. Funding from the HLF has been a game-changer within the heritage sector. Over the years it has made a profound difference to the condition of our heritage and its accessibility.

2. In a tight funding environment, HLF should focus its attention on the condition of the built heritage; once heritage is lost, it is gone for ever. HLF's strategic strapline should therefore retain the notion of making a difference for both people *and* heritage.

3. The Tailored Review recommended that 'HLF should review its stakeholder engagement strategy carefully' (TR5.32). After last year's difficulties HRBA is keen that this should be taken forward, and would be happy to discuss options with HLF if that would be helpful.

4. We agree with the Tailored Review, that HLF could usefully 'assess and clarify it relationship with other lottery distributors'. (Rec 5a TR p.10). In particular, our members would encourage further co-operation between HLF and BIG (TR3.7 p. 31).

Addendum (24 March 2018)
5. We note that the Tailored Review recommended improvements to HLF's collection and use of data and a move towards open data (Recommendations 16 and 17; TR 3.60–64). Based on our experience, we think this is important. We stand ready to discuss with HLF the type of data which would be found useful to those concerned with historic religious buildings.