



Llywodraeth Cymru
Welsh Government

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Welsh Government
Consultation – summary of response

Public Commemoration in Wales: Guidance for Public Bodies

May 2023

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

Overview

This document provides a full summary of the responses to the consultation on 'Public Commemoration in Wales: Guidance for Public Bodies.

Action Required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

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Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [Public commemoration in Wales: guidance for public bodies | GOV.WALES](#)

Introduction

1. Public Commemoration in Wales: Guidance for Public Bodies has been prepared as a next step following the completion of The Slave Trade and the British Empire: an Audit of Commemoration in Wales by a team led by Gaynor Legall, and in response to the Anti-racist Wales Action Plan
2. Its purpose is to help local authorities, town and community councils and other public bodies reach well-informed decisions about existing and future public commemorations, and by doing so contribute to an anti-racist Wales.
3. Preparation of the guidance benefitted from a series of facilitated workshops which brought together a broad spectrum of stakeholders. These workshops included representation from Black, Asian and Minority Ethnic groups, education and academia, local government, the armed forces, faith groups, heritage conservation groups and LGBTQ+ people.
4. The Welsh Government conducted a twelve-week public consultation on this guidance between *October 2022 and 21st February 2023. The consultation was published on the consultation pages of the Welsh Government's website. Respondents were able to submit their views and comments online, by email or by post in Welsh or English.
5. The consultation received 176 responses. The majority of these were from private individuals, but organisational responses were received from:

Association of Local Government Archaeological Officers
(ALGAO):Cymru

Newtown and Llanllwchaiarn Town Council

Gypsies and Travellers Cymru

Institute of Historic Building Conservation

Public Statues and Sculpture Association

Broughton and Bretton Community Council

Wales Heritage Group

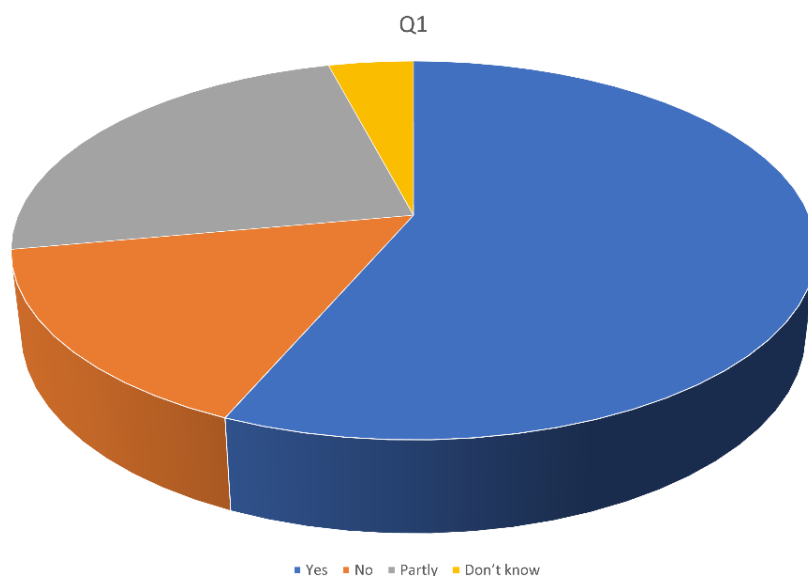
Details of other organisations have been omitted where anonymity was requested.

6. This document provides a summary of the responses. Whilst it does not capture every point raised by respondents, it aims to outline the key themes and issues.
7. Although the majority of responses were positive, several expressed disquiet about the subject, and a small number (less than 15%) went

further, criticising the document and Welsh Government for being “woke” and racist against the White majority.

Summary of Responses

Q1: Thinking about the Guidance text as a whole, do you think it will be useful to public bodies with responsibility for commemorations? (147 responses)



Response	No.	Percentage
Yes	83	56.46
No	23	15.65
Partly	35	23.81
Don't know	6	4.08

Summary analysis

8. The majority of respondents thought that the guidance would be useful to public bodies with responsibility for commemoration. A number of detailed comments were made on particular issues.
9. Although many respondents recognised that the guidance is intended to provide a framework for decision-making, others interpreted it as being overly prescriptive.
10. An issue receiving particular attention was a concern that the guidance represents an attempt to re-write history or to erase parts of the historical record in bringing contemporary values to bear on historical figures and events. Several respondents felt that understanding the actions and behaviour of individuals in the context of their time, or focusing only on

the specific aspects of behaviour commemorated would be better than applying contemporary moral standards.

11. A minority was of the opinion that no action should be taken, and felt that the guidance risked causing division where none existed.
12. Many respondents acknowledged the value in using public commemoration as an opportunity to learn from the past and reflect on what it could teach us.
13. Another issue that was raised by several respondents related to the scope of the guidance: some felt that it was too dominated by the relatively recent past, and failed to consider the full range of contexts in which different forms of slavery have been practiced.
14. Several respondents felt that something needed to be said about Wales as itself a colonised country and the historical subjugation of the Welsh language. Some respondents suggested Wales bears no responsibility for injustices carried out by the British Empire and that these were purely a matter for “the English”
15. Others felt that the focus on anti-racism was too narrow and that other forms of oppression (for example class-based) should also be addressed.
16. Several respondents expressed concern that the guidance was too focused on the present: reflecting this, one respondent suggested introducing a review mechanism to make sure that the guidance remained relevant. Allied to this, it was also suggested that there should be a review process for implementation of any actions taken forward in the light of the guidance.
17. Several respondents felt that the document was too long – some considered that resources would be better directed elsewhere.

Welsh Government response

18. The Welsh Government is pleased that a majority of respondents consider that the guidance will be useful to public bodies responsible for commemoration and is grateful for the detailed comments offered for its improvement.
19. We will provide greater clarity in the introduction to the document explaining that this best-practice guidance sets out a framework for community based decision-making, and makes no specific recommendations about what decisions to make, or what action to take.
20. As regards the charge of re-writing history, the Welsh Government is clear that seeking balance means recognising plurality, allowing other voices to be heard, and other stories to be told than those which have

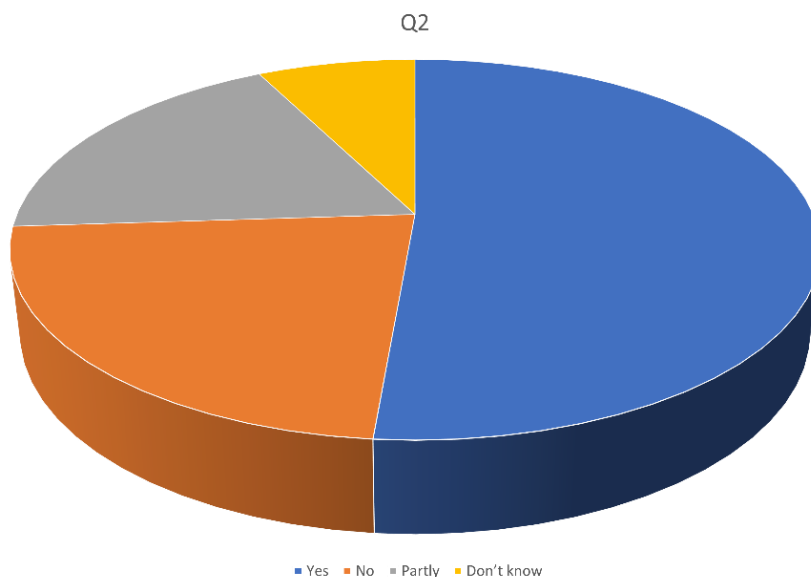
traditionally dominated. This is not re-writing history, but adding to the historical narrative in a way that can deepen historical understanding and enable a more honest relationship with our past. It expects an active recognition of what commemoration represents and a willingness to address the issues it raises in a diverse society striving to be a more equal one.

21. The guidance follows on from the Audit of Commemoration and addresses a specific action in the Anti-racist Wales Action Plan, and therefore the slave trade and the British empire are central to it. However the approach to decision-making that it sets out is also valid when addressing both other historical issues, and other types of commemoration. We will amend the text to make this clearer.

22. The Welsh Government accepts that the draft guidance is insufficiently sensitive to the specific historical context of Wales, which has had its own experience of colonisation. We will acknowledge this more clearly in the introduction to the guidance and will also provide an additional case study that draws on issues more specific to Wales. However, the Welsh Government is clear that Wales did not stand apart from slavery and colonial exploitation, both of which were embedded in the nation's economy and society; these issues are rightly the focus of this guidance.

23. We will consider how best to put in place a mechanism to review the relevance of the guidance and its effectiveness.

Question 2: One goal of Wales' Anti-Racist Wales Action Plan is to deliver a balanced, authentic and decolonised account of the past. Do you think that the guidance document contributes towards this? (146 responses)



Response	No.	Percentage
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Yes	75	51.37
No	33	22.6
Partly	27	18.49
Don't know	11	7.53

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

(61 responses received)

Summary analysis

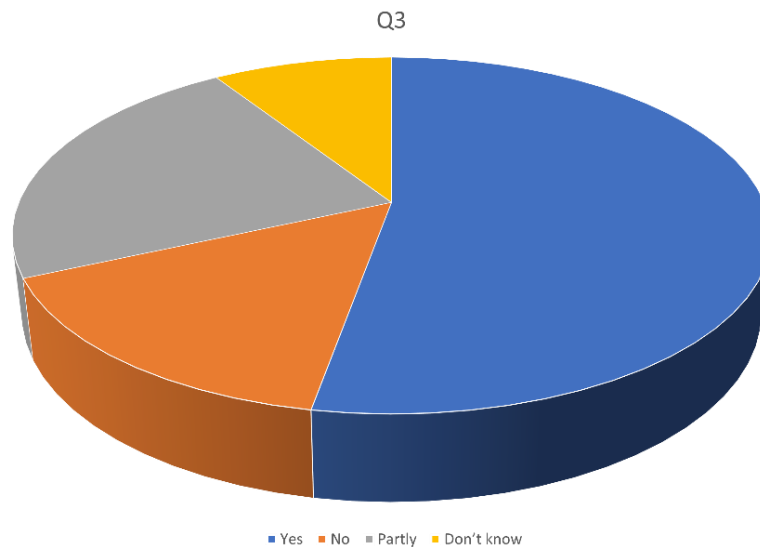
24. Many respondents commented on the question of balance from different perspectives. To some, this question prompted expressions of concern that balance could be tipped by vocal minorities and pressure groups, and stressed the importance of achieving an equal balance of voices, of recognising differences of opinion, and engaging with the diverse society of Wales.
25. Some respondents also expressed concerns about balance in the historical narrative, with some respondents again suggesting that any editing or rewriting of historical narratives risked being unbalanced and should not be attempted.
26. Use of the term 'decolonisation' also prompted some concern, mostly by respondents worried that it would entail the removal of evidence, and be an attempt to re-write history. The phrase 'The past can't be decolonised' summarises these concerns.
27. A couple of respondents made points about implementation - the need to actively seek opportunities to improve the representation of historical facts, and the need to identify resources that would help do this.

Welsh Government response

28. The Welsh Government believes that the guidance on methods of engagement provides a sufficient framework to manage the risks associated with consultation and is aimed at achieving a reasonable balance between different interest groups, recognising the importance of engaging deeply and widely on matters relating to public commemoration.
29. The Welsh Government accepts that the existing definition of decolonisation may have given rise to some confusion about the intentions of this guidance, and may have prompted concerns about the potential removal of historical evidence/statues etc. It will therefore provide a fuller definition that makes clear that decolonisation does not imply censorship or erasure of history.

30. The Welsh Government considers that the document already stresses the importance of balance in the historical narrative, advocating adding new layers to the interpretation, rather than substituting one account with another.

Question 3: 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? (142 responses)



Response	No.	Percentage
Yes	75	52.82
No	22	15.49
Partly	32	22.54
Don't know	13	9.15

What changes, if any, do you think should be made to this section? (45 responses received)

Summary analysis

31. The majority of respondents felt that the guidance does offer an adequate summary of the issues public bodies should be aware of when making decisions about public commemoration. Detailed comments were made on a number of specific points.
32. Some respondents felt that overall the guidance was too long and that this section in particular was in need of simplification. However, the view was also expressed that the document avoided over-simplifying complex issues.

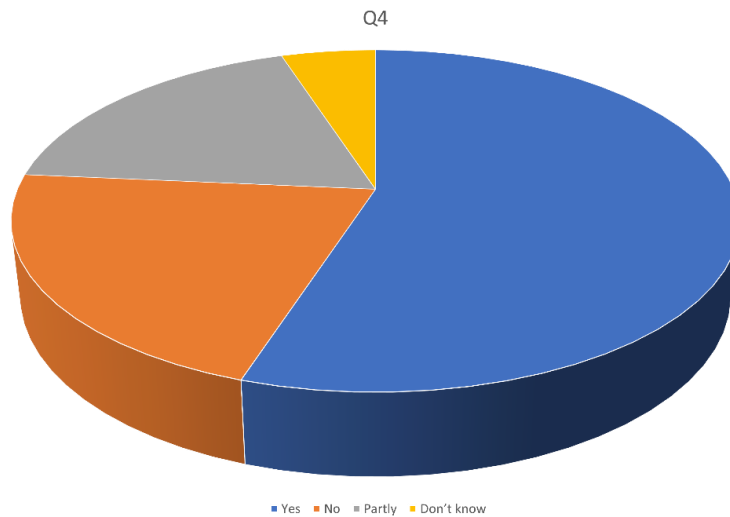
33. The view was also expressed that raising these issues was unnecessary and that there was no need for any intervention. The case-studies in this section prompted several respondents to query why American rather than British examples were used, suggesting that this was because there are no issues in Wales. Several respondents questioned the need to address issues of minority representation.
34. One respondent was concerned that the guidance assumed a set of shared values which may not exist, and questioned how the values underpinning the guidance were defined and agreed.
35. Others felt that the guidance could go further in discussing the extent of links with slavery, and in highlighting other forms of injustice. Some respondents identified other subjects that they felt warranted more attention: these ranged from the teaching of history and the involvement of school pupils and the general public, to the aesthetic value of existing monuments.
36. There was also a call for the principles set out in the guidance to be applied to the interpretation of historic sites and places more generally, rather than just public commemoration, and reference to other forms of commemoration such as war memorials, and informal commemoration such as graffiti.

Welsh Government response

37. The Welsh Government is pleased that a majority of respondents considered that the guidance has identified the issues relevant to public bodies when considering public commemoration, and interested to hear views on how it could be changed.
38. The Welsh Government is committed to celebrating diversity and moving to eliminate inequality in all its forms. Public commemorations are a very visible expression of the values of their time which may not always be those of today. The Welsh Government believes that public commemoration can be a vehicle enabling a fuller and more balanced account of the past to be given, and supporting the presentation of contemporary values in public places. These are complex issues and the guidance is necessarily detailed.
39. On the other specific issues suggested for discussion, amendments will be made to the guidance to make clearer reference to actions under way in other areas such as education, and to the range of values that may attach to public commemoration, including aesthetic values.
40. The Welsh Government recognises that the principles underpinning the guidance will be applicable in contexts other than public commemoration as defined in this guidance. Although the emphasis of this document will continue to be on public commemoration as defined, the introduction will

be strengthened to make it clear that the principles it sets out may be of wider relevance.

Question 4: Step 1 of the Guidance concerns inclusive decision making. It identifies some general principles for inclusive decision-making: Do you agree with these principles? (140 responses)



Response	No.	Percentage
Yes	77	55
No	30	21.43
Partly	26	18.57
Don't know	7	5

Please explain where you consider there to be gaps or omissions: (37 responses received)

Summary analysis

41. The majority of respondents agreed with the principles of inclusive decision making set out in the guidance and welcomed the emphasis on early engagement and listening to different voices. Various concerns were expressed, and questions raised.
42. A general issue raised by several respondents related to the need to ensure genuine inclusion, recognising for example that not all sections of society readily give their views, and cautioning against amplifying certain voices at the expense of others.
43. A minority of respondents considered that the emphasis on inclusion was a modern fad which would generate division.
44. Some questions were raised about the scope of engagement, with several respondents emphasising the importance of local decision-

making, while the point was also made that outreach should not be limited to residentially defined communities.

45. Some respondents raised practical questions about how consultations would be publicised and structured, as this was one way in which some groups could be excluded.
46. At least one respondent also raised the issue of timescales and budgets.

Welsh Government response

47. The Welsh Government is pleased that the majority of respondents agree with the principles of inclusive decision-making set out in the guidance, and welcomes the specific comments made.
48. The Welsh Government stands by the importance of inclusive decision-making as a principle and recognises the need for sensitivity in balancing local and more remote interests, as well as in finding ways of ensuring engagement is genuine. The guidance has attempted to draw this out, but we will consider whether these points could be made more clearly.
49. Implementation of the guidance will be a matter for public bodies, and it will be for them to identify budgets and set time-scales for action.

Question 5: 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? (72 responses received)

Summary analysis

50. Several positive suggestions were offered in response to this question including ideas about who should be commemorated in future, as well as more general observations on how public commemoration might be used.
51. Several respondents felt that local figures and working class people should be commemorated, and there were calls for more women, and more sporting heroes, to be commemorated. There was a specific call for aspects of Welsh history to be celebrated, such as its industrial heritage and historic efforts to protect the language. One respondent suggested that historical and modern communities could be compared, and positive change celebrated.
52. Several respondents felt that monuments presented opportunities to educate, with some emphasising the importance of giving a balanced

view, and of explaining the contemporary context in which commemorations were made.

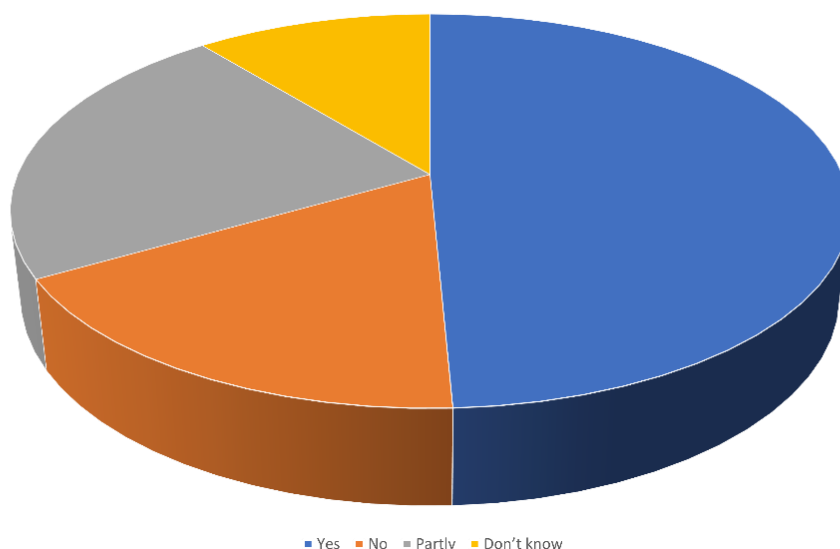
53. Some respondents noted that a process of local consultation might itself identify opportunities from marginalised individuals and groups, and that discussions with religious, Black and Minority Ethnic groups would also help to identify subjects.
54. Some correspondents questioned the value of any new commemoration and suggested that there might be other ways in which objectives could be achieved, such as using annual memorial events to reflect on past atrocities and raise awareness of discrimination.
55. The point was also made that caring for existing sites is important.

Welsh Government Response

56. The Welsh Government welcomes the suggestions made in answer to this question.
57. The engagement process set out in the guidance provides a mechanism for objectives to be set and agreed locally, but we will consider whether there is scope within the guidance to offer more examples of suggested subjects for commemoration that might be helpful in initiating local discussions.
58. Many respondents have raised the issue of balance, and we will make sure that the guidance is clear on the importance of this, recognising that public commemorations are long-term investments, and the interests of present and future generations should therefore be considered.

Question 6: Are the criteria for use in decision-making suggested in step 3 of the Guidance helpful? (138 responses)

Q6



Response	No.	Percentage
Yes	68	49.28
No	24	17.39
Partly	31	22.46
Don't know	15	10.87

Please tell us what changes, if any, would you like to see in this section of the guidance: (27 comments)

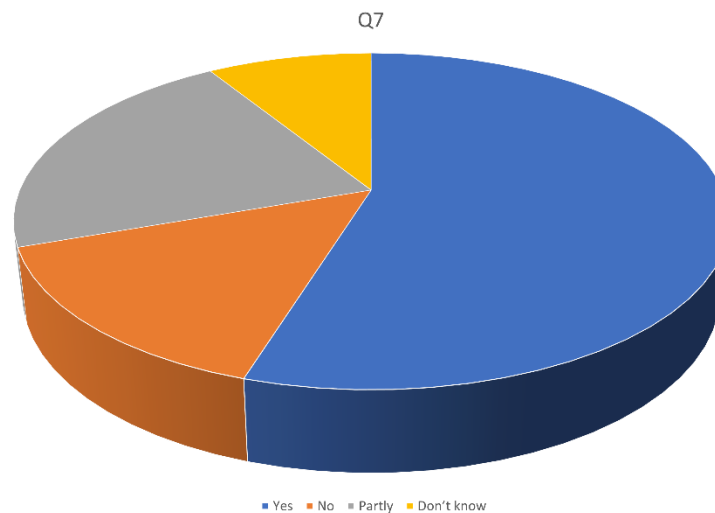
Summary analysis

59. There were relatively few detailed comments in answer to this question, but some concrete suggestions.
60. Some concerns were expressed that the guidance left this issue too vague and open-ended, and that clearer definitions of significance, impact and value were needed.
61. Some respondents felt that an emphasis on values ignored the personal qualities of figures commemorated.
62. Relevance to place and people of the place was suggested as a potential criterion.
63. Some correspondents felt that the aesthetic value of existing commemorations should be given more consideration.
64. There was a specific suggestion that the values set out in Cadw's Conservation Principles for the sustainable management of the historic environment in Wales published in 2011 (historical, evidential, aesthetic and communal) should be used.

Welsh Government response

65. The Welsh Government accepts that this section needs some development. Whilst local agreement of the criteria to use is an important principle, this national guidance could offer a clearer framework.
66. Revisions to the text will include reference to the Conservation Principles, recognising that the heritage values set out therein provide a multi-dimensional framework for considering diverse aspects of a subject.

Question 7: 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? 135 responses



Response	No.	Percentage
Yes	74	54.81
No	20	14.81
Partly	29	21.48
Don't know	12	8.89

What changes if, any, would you make to this section? Are there any important options available to public bodies not covered sufficiently here?: (31 responses)

Summary analysis

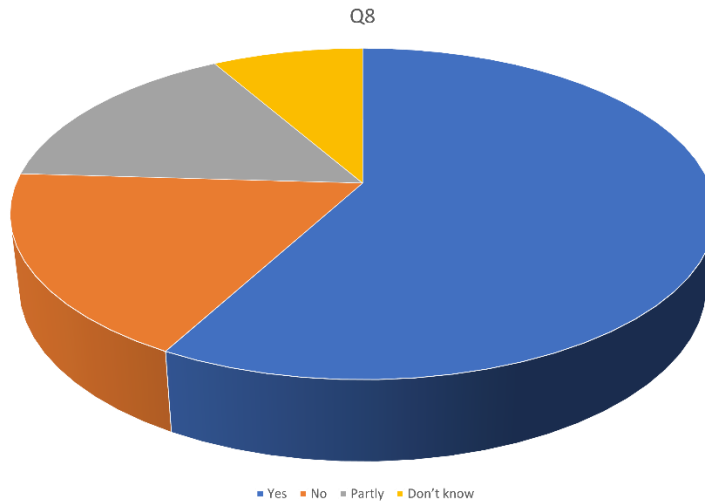
67. Some respondents suggested caveats to make it clear that the list of possible actions was not intended to be exhaustive, and to acknowledge that options can only be considered within budgetary restraints.
68. This question prompted the expression of further disquiet about the potential removal of statues.

69. One respondent noted that the guidance is slanted towards change rather than maintenance of the status quo.
70. Another questioned the emphasis on the relatively recent past, pointing out that racism itself has a long history
71. One respondent felt other options for commemoration – such as tree planting – should be considered.
72. At least one respondent advocated an approach that supplements rather than subtracts, recognising the complexity of the past and present.

Welsh Government response

73. The Welsh Government is pleased that most respondents felt that this section adequately covered the options for action available to public bodies, and welcomes the specific comments made.
74. It recognises that there will be budgetary constraints on any action, but remains committed to the importance of taking action to address injustices and omissions in public commemoration.
75. The guidance is not providing specific advice on what actions should be taken as it believes decision-making should be locally based.
76. We will make it clearer that the list of actions is not exhaustive, and that local engagement processes might themselves provide a framework for the identification of other potential actions.

Question 8: Do you think the Case Studies included in the guidance are helpful in illustrating the issues and range of options available to public bodies? 133 responses.



Response	No.	Percentage
Yes	77	57.89
No	24	18.05
Partly	21	15.79
Don't know	11	8.27

Please suggest any changes you would like to see to these: (34 comments)

Summary analysis

77. Some respondents questioned the use of case studies from beyond the UK, and specifically from America.

78. Several respondents felt that there should be more examples from Wales

79. Some respondents felt that case studies were too slanted towards current concerns.

Welsh Government response

80. The Welsh Government is pleased that most respondents felt that the case studies included within the guidance are helpful. It notes that some changes were suggested.

81. The Welsh Government's view is that the inclusion of case studies drawn from outside the UK including America provides a range of examples not all of which have equivalents within Wales or the UK, but all of which have the potential to inform or inspire future actions here. All the case studies have in common an intention to highlight contentious or overlooked aspects of heritage.

82. The Welsh Government accepts that the inclusion of more examples from Wales would be helpful and will address this in the final text.

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? (80 responses)

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. (68 responses)

Summary analysis

83. Responses to both these questions covered similar ground, and identified a number of issues relating to the Welsh language, of which the most commonly raised concerned the way in which the language has its own history of suppression; some respondents felt that this should be addressed directly in the guidance and that there should be a case-study focused on the history of the use of the Welsh language as an example of contested heritage.
84. Some respondents felt that implementation of the guidance via increased interpretation would create more opportunities for the Welsh language to be used, in consultation and engagement events, and in interpretation including the use of public texts.
85. Although recognising that Welsh should be treated no less favourably than English, several respondents pointed out that for many communities affected by public commemoration, the first language may not be either English or Welsh, and opportunities to promote multi-lingualism should also be taken.
86. A minority of respondents were opposed to any effort by Welsh Government to recognise or preserve the Welsh language, and saw this as prejudicial against monolingual English speakers. There was a sizable overlap between these responses and those who felt there was no need for Guidance on Commemoration or an anti-racism policy in Wales.

Welsh Government response

87. The Welsh Government is committed to ensuring that people have the opportunity to use Welsh and that the Welsh language is treated no less favourably than English.

88. The Welsh Government expects all public bodies to comply with the Welsh Language Standards in matters relating to the provision of services in Welsh, which should include consultation and engagement activity and the provision of information. We will ensure that this is clear in the guidance.
89. The Welsh Government is also committed to a multilingual vision for Wales.

Q11: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them: (50 responses)

Summary analysis

90. Several issues raised in response to other questions were raised again here, notably that nothing should be removed, that past actions should be understood in context, that we shouldn't expect moral perfection in the past, that we should 'look back thoughtfully', that the scope of the guidance should be widened to address the acceptability in general of honouring individuals.
91. There were some concerns about the consultation process on the draft guidance – who it had reached and how extensive it was.
92. There were also some concerns about the process of consultation and engagement advocated in the guidance, with some respondents questioning the extent to which consulted groups would be representative of different communities.
93. Several respondents felt that the guidance is too long.

Welsh Government response

94. The Welsh Government welcomes the points raised, many of which reinforce similar points made in response to previous questions.
95. The guidance is not intended to be prescriptive in respect of actions that should be taken; two key principles are that decision-making should be founded on genuine engagement, with sensitivity in balancing different views, and that it should seek to achieve a fuller and balanced account of the past as a contribution to addressing inequality and exclusion, and making Wales an anti-racist nation.
96. The Welsh Government notes that very few consultation responses were received from public bodies, and recognises the need to work with them in order to ensure that the guidance is implemented. Development of the

guidance was informed by detailed engagement with a broad spectrum of stakeholders.

97. The Welsh Government accepts that this is a lengthy document, but the subject it covers is a complex one, and a short summary has been included within the document.

