

# **Report of the Review of the Royal Commission on the Ancient and Historical Monuments of Wales and Cadw**

Executive Summary

This report summarises the work undertaken to review the relationship between Cadw and the Royal Commission on the Ancient and Historic Monuments of Wales. It concludes that further detailed work is required on benefits identification and implementation, followed by consultation with the wider historic environment sector in Wales and its partners.

The review concluded that a merger between the two organisations could be a means of providing long term benefit for the sector and for the people of Wales, but that further work, in particular detailed transitional and long-term costings, would be required to demonstrate that proposition. There was also a feeling from some members of the working group that there was a need to provide additional assurances on how the National Monuments Record for Wales can be safeguarded into the future. The preference of the group was to provide legislative protection.

Immediate closer collaboration would be beneficial, and could be achieved without major investment or disruption, as has been identified in the detailed discussions undertaken as part of this exercise. The more significant benefits of closer collaboration would come as a result of new joint projects and activities which could only be achieved with additional funding or by redirecting funding from current work.

Details of the options that have been considered and summaries of the consultations with staff and external stakeholders are contained in the text and in the Annexes to the Report.

The Report is presented in the context of the [Budget statement for 2026–2027](#), published on 1 July 2025.

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# Abbreviations

Anti-Racist Wales Action Plan	<b>ARWAP</b>
Arts and Humanities Research Council	<b>AHRC</b>
Full Time Equivalent	<b>FTE</b>
Historic Asset Database	<b>HAD</b>
Memorandum of Understanding	<b>MoU</b>
National Lottery Heritage Fund	<b>NLHF</b>
National Monuments Record of Wales	<b>NMRW</b>
Royal Commission on the Ancient and Historical Monuments of Wales	<b>Royal Commission</b>
Strengths, Weaknesses, Opportunités and Threats	<b>SWOT</b>
The National Archives	<b>TNA</b>

# Introduction

In December 2023 an independent [review of Cadw's governance arrangements](#) was published. It included the following recommendation:

*A review of the relationship between Cadw and the Royal Commission, if acceptable to all parties, should be undertaken by both organisations working together. Approximately eight to nine years ago, both organisations explored potential synergies of closer working. Since then as evidenced in this review, the strategic context has changed and it would be timely for both organisations to explore options for developing the potential synergies that exist between them in meeting their shared responsibilities and obligations to protect, record and enhance public understanding of the historic environment.*

The then Cabinet Secretary for Culture and Social Justice [formally responded](#) to the report on 12 June 2024, agreeing that it would be timely to explore the relationship between the two organisations. She stated that:

*Both organisations need to look closely at their functions and responsibilities and identify synergies and different ways of delivering. All options need to be considered, from more closely aligning work programmes to full amalgamation, as has happened to similar organisations in England and Scotland.*

The purpose of the current review was to take forward this recommendation by:

- mapping and detailing the relevant functions and responsibilities of each organisation and identifying key synergies;
- exploring options for sustaining and improving the delivery of the identified functions and synergies; and
- making recommendations to the Welsh Ministers.

The objectives for the review are to ensure that by March 2026 there is in place the right structure to support sustainable high-quality historic environment services for Wales, including the National Monuments Record of Wales (NMRW), with agreed aims and objectives and arrangements for a sustainable workforce, with specialist skills, safeguarded for the future.

The Minister for Culture, Skills and Social Partnership [confirmed his support](#) for the work that was underway in a statement of 11 October 2024.

## Methods

A working group was established to oversee the review, working alongside and in collaboration with groups taking forward other recommendations of the Cadw governance review. The working group began its work in September 2024 and wound up in August 2025. The review was taken forward in social partnership with working group members including:

- The CEOs of both Cadw and the Royal Commission
- The serving Chairs of both Cadw's Board and the Royal Commission
- Union representatives
- An independent heritage specialist
- The Royal Commission Partnership Team
- Welsh Government officials

See Annex 1 for Terms of Reference and membership.

The Group has drawn on the wider expertise of Cadw, the Royal Commission and Welsh Government specialists through the work of task and finish groups which reported to the working group.

This report summarises the context for the review, the work undertaken and the views reached by the working group.

## Strategic context

Over the last decade, the Welsh Government has demonstrated a clear commitment to improving the protection and management of the historic environment. This was first evident with the passage of the Historic Environment (Wales) Act 2016, which was heralded as the most progressive legislation of its kind in the UK. The Historic Environment (Wales) Act 2023 further reinforced that commitment, providing Wales with the most up-to-date historic environment legislation, fully bilingual in Welsh and English, and free from references to other UK jurisdictions. The importance of the historic environment is now interwoven with Wales's legislative framework, showcasing a sustained effort by the Welsh Government to preserve and enhance the nation's rich heritage for future generations.

The historic environment has a significant role to play in supporting the implementation of the Welsh Government's wider priorities, including the Well-being of Future Generations (Wales) Act 2015, the *Anti-racist Wales Action Plan*, climate emergency provisions, and the *Priorities for Culture*.

The Well-being of Future Generations (Wales) Act 2015 aims to improve the social, economic, environmental, and cultural well-being of Wales by setting seven well-being goals for public bodies. One of these goals is to create "a Wales of vibrant culture and thriving Welsh language". The historic environment plays a crucial role in achieving this cultural goal by preserving and promoting Wales's rich heritage, including its historic buildings, monuments, and landscapes.

To progress this goal the Welsh Government identified five priorities for the historic environment in Wales.

- 'Caring for our historic environment' — including the 131 monuments in the care of Cadw, the provision of expert advice to other owners in the public and private sectors, grant programmes and online access to records and information;
- 'Making skills matter' — including mainstreaming heritage craft skills;
- 'Cherishing and enjoying our historic environment' — including encouraging more visitors to historic sites, particularly young people, recognising cost barriers and the need to improve physical access, and working more closely with third sector organisations;
- 'Making our historic environment work for our economic well-being' — including investment in Cadw's sites and support for sites not in state care; and
- 'Delivering through partnership' — including closer working between Cadw, the Royal Commission, the National Library and Amgueddfa Cymru, and Cadw's internal advisory board.

The *Priorities for Culture* set long-term priorities and ambitions for the culture sector and more broadly, and are expected to inform strategic direction and investment in the culture sector for the mid- to long-term, until approximately 2030. The Welsh Government consulted on draft Priorities last summer and the final versions were published on 20 May 2025.

The 'Priorities for Culture' consist of the following three priorities, each supported by a series of ambitions:

- Culture brings people together
- Celebrating Wales as a nation of culture; and
- Culture is resilient and sustainable.

The third priority is particularly relevant to this review. Ambitions in this area include a number of references to collaboration, including ‘12: Culture and heritage bodies will work collaboratively to maximise the full potential of specialist teams and collections...’

This policy context is influenced by the economic context within which the Welsh Government operates. The interactive dashboard showing the Welsh economy in numbers indicates that ‘in general the Welsh economy has kept pace with changes in the UK economy over the medium term across a range of indicators.’ However, the economic outlook remains cautious, with subdued growth and inflation affecting household incomes.<sup>1</sup> The sector needs to operate as effectively and efficiently as possible to ensure value for money in the context of continuing pressure on public finances.

The economic situation has contributed to the challenging financial context in which both organisations are working. In 2024–25 both organisations faced a 10.5% reduction in their indicative revenue funding from the Welsh Government, although this was on a 2023–24 time-limited uplifted budget to deliver activity under the Cooperation Agreement. By 2025–26, the Royal Commission’s budget had returned to the pre 2023–24 level. Both organisations are managing challenging budgets and have already introduced efficiencies in re-negotiating contracts, managed reductions and tighter controls for discretionary spend.

Difficult decisions had to be made to respond to this situation. For the Royal Commission this included running a programme of voluntary redundancies and a significant reduction in its staffing levels.

## Core activities of Cadw and the Royal Commission

**Cadw** is the Welsh Government’s historic environment service. It works for an accessible and well protected historic environment for Wales. It cares for historic places and protects them so that they can continue to inspire generations to come. It ensures that historic places continue to play a vital role in shaping modern Wales, provide a living link to the country’s diverse histories and help make sense of Wales’s place in a changing world.

Cadw is a division of the Welsh Government’s Education, Culture and Welsh Language Group and is answerable to the Minister for Culture, Skills and Social Partnership.

Cadw is supported by a Board including non-executive members who advise, support, scrutinise and monitor Cadw’s strategic direction, business plan and standards. The Board provides advice and guidance and is not a decision-making body.

Further details can be found on [Cadw’s website](#).

**The Royal Commission** was established under and operates according to a Royal Warrant issued in 1908. It is the originator, curator and supplier of authoritative information for individual, corporate and governmental decision makers, researchers, and the general public. It has a leading national role in developing and promoting understanding of the archaeological, built and maritime heritage of Wales. In particular, the Royal Commission is responsible for the NMRW, the archive of the historic environment of Wales, which includes material on all aspects of archaeological, architectural, ecclesiastical, industrial, defensive and maritime history. Access to the NMRW is provided on-line and via library and search room facilities. Its purpose has not been updated since the Royal Warrant was originally issued and equivalent bodies in the other UK nations have since been disbanded or amalgamated into successor bodies.

<sup>1</sup> [Wales economic and fiscal report 2024 | GOV.WALES](#)

The Commissioners also receive a remit letter from the Welsh Government which sets out what the Commission is expected to achieve with the resources given to it by the Government. The current remit letter covers the Term of Government period 2021 to 2026. It will be reviewed for 2026 onwards to reflect the new Government's priorities.

Further details can be found on the [Royal Commission's website](#).

The functions and key activities of the two organisations are set out at high level in Annex 2.

## **Previous review**

In May 2012 the Minister for Housing, Regeneration and Heritage announced the establishment of a working group to look at options for the possible merger of the Royal Commission and other organisations including Cadw, as part of a wider review of historic environment services. The Communities, Equality and Local Government Committee of the National Assembly for Wales held an inquiry into the Welsh Government's historic environment policy, which included examination of this proposal. The Committee heard evidence from a number of stakeholders with reservations about this approach and, as a result, the Minister looked again at the proposal and it was decided that the two organisations should remain independent, whilst cooperating closely together.

Since that time there have been relevant developments in the legislative framework (in particular: the Historic Environment (Wales) Act 2023 and its suite of supporting secondary legislation, which came into full effect on 4 November 2024); the economic and financial context; and ways of working which make it appropriate to reexamine the issue.



# Review methodology

## Principles

Principles which guided the review process included:

- working in collaboration with interested parties;
- commitment to social partnership;
- the involvement of independent heritage expertise;
- ensuring financial sustainability; and
- reliance on a strong evidence base.

The Minister confirmed when responding to the review of Cadw's governance (see above) that the previous decision that Cadw should remain a part of the Welsh Government should not be revisited. This review therefore took that structure as a fixed parameter when considering future options. Much of Cadw's work relates to the care, protection, interpretation and opening to the public of historic sites under the care of the Welsh Government. The nature of this work would not be fundamentally altered by the outcome of the review and it has not, therefore, formed a major part of the working group's considerations.

Both Cadw and the Royal Commission work with a range of other heritage organisations across Wales and, where appropriate, in other parts of the United Kingdom. Some of the stakeholders that contributed to this review therefore argued that it should have looked more widely at Cadw and Royal Commission's functions alongside other organisations working in and for the historic environment of Wales. In particular, it was noted that Heneb was created after publication of the report on the governance of Cadw that led to this work.

The working group acknowledged the links between other organisations and Cadw and the Royal Commission, but did not think it appropriate to widen the scope of the review. The Group retained focus on the government-funded and complementary roles Cadw and the Royal Commission deliver, to improve their effectiveness and resilience. This does not discount the potential for closer collaboration with other organisations in future. Indeed, strategic collaboration is one of the key ambitions of the *Priorities for Culture*.

Closer collaboration with other organisations can be considered as part of other initiatives or following the conclusion of this review, for example through the Historic Wales Partnership.

## Methodology

The working group was chaired by Steffan Roberts, Deputy Director Arts and Sport (Welsh Government Directorate of Culture, Heritage Sport and the Welsh Language), who acted as Senior Responsible Officer. The Terms of Reference and membership of the working group are set out at Annex 1.

The review process was overseen by the group, which met monthly throughout the period. Staff were engaged through staff workshops, regular staff newsletters providing feedback from working group meetings, representation on the working group itself and as members of subject specific task and finish groups. External stakeholders were informed of the establishment of the review, and invited to contribute in writing and/or through attendance at stakeholder workshops.

The group oversaw the work of and received reports from the staff and stakeholder workshops, task and finish groups related to the NMRW, IT and financial advice and other relevant strands of the work being undertaken to consider implementation of the recommendations of the recent Cadw Governance Review. Advice was commissioned and papers produced to address specific issues, including seeking external legal advice to support the Group's deliberations. The Group agreed initial descriptions of the main features of the three options under consideration (business as usual; closer collaboration; and merger). These descriptions formed the basis for discussion at staff and stakeholder workshops and were subsequently refined in the light of those discussions and further development work.

Critical success factors were developed and applied to each of the options to test the robustness of thinking and to assess the options against the overarching objectives of the review, i.e. that by March 2026 there is in place the right structure to support sustainable high-quality historic environment services for Wales, with agreed aims and objectives and arrangements for a sustainable workforce, with specialist skills, safeguarded for the future. They are set out in each of the annexes summarising the options considered.

# Stakeholder views

## Staff views

It was made clear to staff at the outset of the review that this was not a money-saving exercise, providing reassurance after a difficult year in which funding was reduced, a year earlier than expected. However, financial sustainability for the heritage sector is critical in terms of the proposed model put forward. Both Cadw and the Royal Commission held internal discussions in advance of joint workshops which took place over two days in October 2024 and were attended by staff of both organisations. A background note on the three options being considered was provided in advance of the workshops. At the events, after general introductions, three groups of issues were considered in more detail, each bringing together aspects of the work of the Royal Commission and Cadw:

- Survey, investigation, research, historic environment advice and heritage at risk;
- Outreach, public engagement, lifelong learning and websites; and
- Records, archive and digital collaboration.

Staff engaged fully with the discussion and the analysis of the issues was generally shared by staff from both organisations. One observation that emerged from all groups was that they had learned a great deal about the detail of one another's work as a result of the discussions and that the better understanding arising from this would help them work more effectively together in future. Whatever the outcome of the review there was a clear enthusiasm for continuing the conversation and improving future communications still further.

Feedback was provided to workshop attendees after the events and throughout the process monthly staff updates have been provided to all staff. There is real enthusiasm for new ways of working together alongside some concern about the uncertainty inevitably created until final decisions have been taken and announced.

As the review has continued, staff have continued to be involved in follow up discussions and consideration of, for example, future management structures under different options.

## External stakeholder views

Three meetings with individual organisations that have particularly close links with either or both Cadw and the Royal Commission took place before Christmas 2024.

Two successful online workshops with stakeholders took place in the week of 6 January 2025. Further comments were subsequently received from a number of those present.

The workshops were informed by a note on the background to the review itself and an analysis of the implications of each of the main options under discussion (Annex 3).

Main themes from the staff and external stakeholder workshops were summarised from the transcripts (Annexes 4–5).

A number of participants argued that the review should broaden its parameters to consider the wider provision of historic environment services in Wales. It was made clear at the time that the issues being addressed were as set out in the invitation to the workshops. Most participants indicated that they would hope to comment on final recommendations before implementation.

A further meeting with TNA took place in February 2025 to discuss detailed issues particularly, including those in relation to the NMRW and Place of Deposit requirements.

Two major themes emerged from the stakeholder engagement process and informed the assessment of other more detailed comments:

- The knowledge and professionalism of both Cadw and Royal Commission staff was widely acknowledged and appreciated. Participants were concerned to ensure that changes should enhance that knowledge and professionalism and not put it at risk.

- There was little enthusiasm for an outcome which left things exactly as they are now and widespread recognition of the need for change.

The discussions were positive and engaged, and many of the points raised were presented as open questions rather than statements of fixed positions.

Whether closer working or merger was the preferred option was felt to depend on further information in a number of areas: e.g. what changes might emerge in the way in which Cadw operates as a result of other strands of the Cadw review; the nature of protections that might be put in place for the NMRW; the legal requirements associated with being a Place of Deposit under the Public Records Act; how Cadw and the Royal Commission would relate to wider historic environment and heritage organisations in future; and the financial implications of options.

The workshops and meetings all reiterated the need for any proposals to be sense-checked against what would be best for the people of Wales, including public benefit and taxpayer value, and the best interests of the historic environment in Wales, rather than against individual organisational interests.

#### **Key issues raised across workshops:**

- **Importance of maintaining research and publications capacity.** Financial constraints have led to concerns about the limitations on this work. The current variety of formats for publication was appreciated but understood to carry an overhead cost.
- **Data accessibility and archive management.** There are currently a number of different portals for accessing data and it can be difficult for users to identify the best approach. There were calls for more integrated systems to reinforce the authority and completeness of the national record, which is currently fragmented and incomplete, and to allow for easier access.

- **Access to external funding** — currently available to the Royal Commission from grant-making trusts, which may not be as easy to access for an organisation which is part of Government, and educational and research funding which may likewise be less easy to access by an organisation which is part of Government.
- **Independence of advice within the planning system** — the nature of the advice currently provided by Cadw and Royal Commission staff is quite different. Cadw generally provides brief factual information related to the statutory position, whereas Royal Commission staff can provide more contextual and research-based information. It was thought essential that expert staff were able to continue to give independent, expert advice.
- **Ability to recruit across the range of specialisms and expertise needed** — with a recognition that this is currently constrained by resource availability.
- **Ability to advocate on behalf of the historic environment** and serve as trustees and officers of national heritage societies — currently allowable for Royal Commission staff in a way that is more restricted for Cadw staff as the latter are civil servants who cannot go beyond agreed Ministerial positions.

**The role and position of the NMRW** was a particular source of concern to workshop participants, and their questions informed the discussion with The National Archives (TNA) in February, and subsequent further discussions. TNA confirmed that there is no legal barrier to the NMRW being part of a Government Department — TNA itself is a Non-Ministerial Department of the DCMS — and still continuing as a Place of Deposit.

TNA would reexamine the position of the NMRW as an Appointed Place of Deposit and as an accredited archive once any new arrangements had been identified and put into place. The NMRW task and finish group believe that guaranteed freedom from Ministerial direction would be key to retaining the NMRW's current status.

This could be achieved in a number of ways which would need to be tested in the development of implementation options. For example, NMRW could be protected through legislation (which would need time in the legislative programme), through a new/ revised Royal Warrant, through the establishment of an independent charity or through inclusion in a published Memorandum of Understanding (MoU) between the Welsh Government and Cadw. A legislative solution would provide the best guarantee. Further detail is at Annex 6.

## Options analysis

The following tables set out a Strengths/Weaknesses/ Opportunities/Threats (SWOT) analysis for each of the three options considered. They distil the discussions and input of the staff and stakeholder workshops, working group meetings and task and finish group work. More detail of the options and issues considered in relation to closer collaboration are set out in Annex 7. Further supporting papers exist in all areas but have not been reproduced in detail here.

In summary, no overwhelming **legal** obstacles were identified in relation to any of the three options. Merger would require careful handling of the position of the NMRW, and possibly legislation to ensure that some specific functions of the Royal Commission could be carried out by Cadw as part of the Welsh Government. Further legal analysis would be needed once an agreed way forward had been identified to explore the viability of the options set out above.

Consideration of **IT issues** concluded that a data-only merger would be complex, expensive and lose previous Welsh Government and Royal Commission investment in existing systems, as well as hampering the work of staff, lead to significant downtime and hence loss of access to resources for the public during the redevelopment phase.

These risks would not apply to either closer collaboration or an air-gapped arrangement whereby, in the event of a merger, most of the Commission's applications would remain outside Welsh Government IT networks, managed by specialist IT staff, but compliant with Welsh Government Cyber Security standards.

The **finance** group recognised that both organisations are managing challenging budgets and have already introduced efficiencies in re-negotiating contracts, managed reductions and tighter controls for discretionary spend. Significantly closer collaboration and merger would both require investment in the short term. The merger option could prove more financially sustainable in the long run but would have higher transitional costs. Being within Government, Cadw has a more direct role in budget setting and an opportunity to present a consolidated case for heritage funding with Ministers.

The elements of each option were assessed against the overarching objective of a sustainable high-quality historic environment service for Wales with agreed aims and objectives delivered by a sustainable, skilled workforce safeguarded for the future. This was evaluated against the following success criteria:

- A sustainable high-quality historic environment service for Wales.
- With agreed aims and objectives.
- Delivered by a sustainable skilled workforce safeguarded for the future.
- Sustainability: in terms of cost, staffing and governance structures.
- Quality of Service: in terms of staff expertise and capacity, reliability of service and IT systems, and ease of access for customers.
- Cost: in terms of affordability and value for money.
- Implementation/timing: in terms of deliverability.
- Staff/stakeholder impact: in terms of satisfaction.

Section 6

# Summary assessment

The following tables contain a summarised SWOT analysis for each option considered, followed by an assessment against the success criteria set out above.

**Business as usual**

Cadw and the Royal Commission remain as two separate entities. The Royal Commission continues to have a Royal Warrant and Board of Commissioners. The NMRW remains outside Government control.

<p><b>Strengths</b></p> <p>Maximises flexibility within the Warrant and Remit Letter for the Royal Commission to set its own strategic priorities and delivery plan, making its own decisions about priorities for research and survey work, based on the expert guidance of Commissioners.</p> <p>NMRW remains clearly outside Government control.</p> <p>Cadw management can continue to focus on its own priorities.</p> <p>Least short-term disruption for staff in all organisations involved.</p> <p>Maintains existing lines of communication/contacts with external stakeholders, including ability of Royal Commission staff/Commissioners to act as independent advocates for the historic environment.</p> <p>The Royal Commission publishes annual report detailing work done and how money has been spent.</p>	<p><b>Weaknesses</b></p> <p>Continuing uncertainty of funding and resource availability, leading to continuing staff instability and impossibility of succession planning in the Royal Commission, with inability to deliver against some core functions.</p> <p>Therefore circumstances which led to the current review continue, with risk of need for further re-examination in future.</p> <p>Does not meet ambitions of staff or external stakeholders.</p> <p>Challenging for Cadw to offer detailed, confidential policy advice in some policy areas within Welsh Government that impact the historic environment.</p> <p>Impact of heritage expertise is not maximised or streamlined, being in two different organisations. There may be gaps in provision. This may limit effectiveness of influencing across Welsh Government and public sector.</p> <p>Welsh Government has less direct involvement with the priorities of the Royal Commission and hence ability to ensure funding delivers on Government priorities.</p>
<p><b>Opportunities</b></p> <p>Continuing possibility of attracting outside project funding to the Royal Commission (with continuing concerns about viability).</p>	<p><b>Threats</b></p> <p>Limited funding for the Royal Commission makes it unsustainable as an independent entity.</p> <p>Further reductions in staffing to live within the Royal Commission funding envelope leads to inability to meet terms of Royal Warrant and remit letter, leading to further examination of status, requiring more time and input from senior staff of both organisations, the Welsh Ministers and external stakeholders.</p>

This model would see the Royal Commission continue as a separate entity, operating under the Royal Warrant, overseen by a Board of Commissioners and sponsored by the sponsorship division of the Welsh Government. The bulk of its funding would continue to come from the Welsh Government, with direction provided by a remit letter. The NMRW would remain clearly independent of Government.

Cadw would continue to lack direct access to resource in some areas. The Royal Commission staff would also continue to work under significant pressure with staff taking on more than one role.

There was very little support for this option from internal or external stakeholders, who were conscious of the difficulties experienced by the Royal Commission staff and Commissioners in fulfilling the remit of the Royal Warrant, given that financial pressures would continue to be acute for the foreseeable future.

The model was not seen to address the issues which had led to the review in the first place and was thought very unlikely to be sustainable in the long term.

For example, the Royal Commission faces issues in recruiting sufficient staff to cover its full responsibilities, with expertise one person deep and succession planning impossible.

This option performs poorly against the sustainability, quality of service and staff and stakeholder impact criteria.

It is neutral in terms of cost, implementation and timing and governance deliverability in that it requires no change in these areas.

Success criteria			Red/Amber/Green
Sustainability	Cost	As now	G
	Staffing	Lack of capacity continues	A/R
	Governance	Pressure on Commissioners to deliver both Royal Warrant and Programme for Government	A
Quality of service	Staff expertise	Lack of capacity continues	A/R
	Reliability	Lack of capacity continues	R
	IT	Lack of capacity continues	A
Cost	Affordability	As now	G/A
Implementation/timing	Deliverability	As now	G
Staff/stakeholder impact		Disappointed stakeholders who are looking for change	R
Governance	Stability	Unlikely to remain in place in long term	A/R
	Deliverability	As now	G

Closer collaboration

Cadw and the Royal Commission remain as two separate entities. the Royal Commission continues to have a Royal Warrant and Board of Commissioners. The NMRW remains outside Government control. Both organisations seek opportunities for active

collaboration and there is a move towards identifying the lead organisation in some areas of activity. The extent of the collaboration could vary significantly, with consequent variability in terms of costs and outcomes.

Strengths

- Royal Warrant remains in place as principal strategic and constitutional underpinning for the work of the Commission under the guidance of Commissioners appointed for their relevant experience.
- National Monuments Record remains outside government control.
- Maintains flexibility for the Royal Commission to develop and deploy IT systems specific to the work of the Commission without needing Government involvement, other than strict cyber security compliance, which would be beneficial for both organisations.
- Allows the Royal Commission to continue to raise funds from external sources and benefit from educational discounts for some software.
- Allows the Royal Commission Commissioners/staff to continue to act as an independent voice of advocacy for sector.
- Low impact on service provision.

Weaknesses

- Both organisations continue to face significant financial challenges. Without additional funding, there would be little opportunity for new collaborative projects.
- Development of new collaboration mechanisms requires some input of senior and other staff time.
- Potential increased complexity in governance and accountability structures could lead to inefficiencies/ tensions in decision-making and role definition.
- Monitoring by multiple entities (sponsorship team, Commissioners, Cadw Board) could lead to conflicting views on priorities and progress (as now)
- Access to Commission digital resources is in one direction only i.e. Cadw has access to the Royal Commission resources but not the other way around, and is dependent on cross-organisational IT skills and capacity which may lead to increased workload/ bottlenecks.

Opportunities

- Could lead to more streamlined and effective service (but at additional cost).
- If sufficiently flexible, collaboration could be expanded in future to include other members of the Historic Wales Strategic Partnership.
- Opportunities for shared training programmes and career opportunities for staff, as well as a shad approach to apprenticeships and internships\*
- Joint initiatives foster greater public engagement and awareness\*.
- Opportunities for further collaborations with academic/ heritage sector bodies in Wales and beyond\*.
- Longer term ambition of single record heritage service for Wales.
- \*All these could happen now with appropriate levels of funding. The authority and leverage of Cadw as part of Government would make them more likely to happen.

Threats

- Limited funding for the Royal Commission makes it unsustainable as an independent entity.
- Further reductions in staffing to live within the Royal Commission funding envelope leads to inability to meet terms of Royal Warrant and remit letter, leading to further examination of status, requiring more time and input from *senior staff of both organisations, the Welsh Ministers and external stakeholders.*



The aim of this option would be to ensure the future sustainability of essential functions. Cadw and the Royal Commission would operate as distinct yet complementary entities with aligned goals. Collaboration would concentrate on areas where their responsibilities intersect, and could be guided by a strategic framework and formal agreements.

At its most developed a joint plan would need to be drawn up and approved by Ministers and both Boards for the whole of the Programme for Government. It would identify areas for collaboration and objectives, supported by an annual joint business plan. Joint meetings of the Cadw Board and Commissioners would be held at least annually. Joint senior team meetings would be established. Sponsorship arrangements would remain unchanged. Clear mechanisms would be needed to deal with and resolve disagreements over priorities or on operational matters.

Current staffing levels would be insufficient to operate this model to its full effect and also deliver against core responsibilities. Additional capacity and funding would be needed for that to happen. Lighter touch collaboration would be possible, and would primarily have opportunity costs in terms of staff time.

Users would see little change without additional capacity to service the arrangements and create new joint projects and workstreams.

This option performs relatively weakly against the sustainability, cost, implementation and timing criteria and has limited benefits in terms of the quality of service criterion. It fails the staff and stakeholder impact criterion but is mildly positive against the governance criterion once in steady state.

To make an impact closer collaboration would require additional funding for transformational projects, the most significant being the digital platform for the historic environment.

Success criteria			Red/Amber/Green
Sustainability	Cost	Continuing cost to operate closer working structures	A/R
	Staffing	Some disappointment if no obvious benefits or increase in staff capacity	A
	Governance	Demands more time for successful governance	A
Quality of service	Staff expertise	Possibility of making better cross organisational use of individuals' expertise	A/G
	Reliability		A
	IT	Little change without investment	A
Cost	Affordability	Continuing cost to operate closer working structures	A/R
Implementation/timing	Deliverability	Would absorb senior staff time at risk of putting other priorities on hold	A/R
Staff/stakeholder impact		Some welcome, if visible, improvements in e.g. internal comms, but also some disappointment	A/G
Governance	Stability	Unlikely to be seen as permanent answer but should improve effectiveness	A
	Deliverability	Needs more management capacity than currently available	A

# Merger

The two organisations are brought together into one under the Cadw banner.

## Strengths

- Sustains key functions: larger teams and/or rationalisation with a greater critical mass may improve the resilience of the organisations or enable additional functions to be prioritised.
- Availability of access to Welsh Government expertise, and possibly funding, has the potential to increase.
- Reduced administrative burden on Culture division, the Sponsorship division, and Royal Commission management processes.
- Streamlined governance should free up resources and reduce costs.
- Improved career development opportunities for staff.
- Benefits of shared access to some Welsh Government IT systems and day-to day IT support. Acquisition of Commission's IT staff gives Cadw access to additional skills.
- Cadw's annual report would promote the wider heritage sector and include Royal Commission accounts Cadw Annual Report.

## Opportunities

- Greater clarity through development of single vision and mission, then a single operational plan — a one-stop shop for the delivery of publicly funded historic environment services for Wales at a national level.
- Improved access for Royal Commission teams to wider Welsh Government resources and services to support key responsibilities and Ministerial priorities for the historic environment.
- Stronger single-body identity and opportunities to reach wider audiences.
- Longer term ambition of single record heritage service for Wales.
- Public may increase donations to NMRW given more recognised brand and profile of Cadw (although may also be concerns about giving records to a part of government).
- Potential to take forward different/additional projects and priorities.
- Ability to deliver Priorities for Culture, ArWAP and other Government priorities enhanced.
- Staffing in sponsorship functions and related activities released for other purposes.

## Weaknesses

- Some external funders might be more reluctant to give grants to a governmental body, under the additionality rule that their funding should not replace core Government services.
- Perception that role of NMRW could be influenced by Ministers (but could be mitigated by clear protections for NMRW) .
- Transferring Royal Commission IT data and expertise to Cadw would require additional staff capacity for a finite period.
- Potential additional IT costs due to loss of educational licenses, but also potential savings from being included in wider contracts and partnerships.
- Rebranding costs to switch from the Royal Commission to Cadw for NMRW archival materials and the Coflein digital delivery platform.
- Potential additional staff costs from aligning Cadw and Commission staff grades and pay.
- No Cadw experience of managing an archive. Mitigated by experience within Commission.

## Threats

- Merger does not remove all resilience issues for the organisations.
- Risk that some former Royal Commission functions not seen as priority within Welsh Government.
- Risk of needing to make difficult choices between competing former Royal Commission and Cadw teams' priorities and approaches.
- Possible loss of some external funding opportunities.
- Risk that public could be reluctant to donate records to NMRW if part of Welsh Government (but could be mitigated by clear protections for NMRW).
- Risk to IT innovation/ need for compliance constraints and increased storage requirements within government secure IT systems.
- Service disruption through need for senior management to focus on change process.
- Loss of expert guidance with dissolution of the Royal Commission Board of Commissioners as unlikely that all Commissioners would join Cadw Advisory Board. Mitigated to an extent by broadening Cadw Board membership under the terms of a merger.
- Very large job for CEO becomes even bigger and may not be sustainable.
- Potential conflict or duplication between archive services in Culture Division and Cadw.

In structural terms, this option performs most strongly against the sustainability, staff and stakeholder impact and governance criteria and was generally seen as the most likely option to meet the objectives of the exercise, provided that outstanding issues can be resolved. However, it requires resource input to succeed, and the production of detailed costings.

The strongest protection for the NMRW would require legislation, and hence priority in a future Government's legislative programme. Other governance elements would also require longer lead times than the closer collaboration model. An outline business case is essential before this option could be recommended for implementation.

Success criteria			Red/Amber /Green
Sustainability	Cost	Steady state: some small admin efficiencies	A/G
	Staffing	Increased opportunities for staff training, progression etc	G
	Governance	Subject to agreed MoU	A
Quality of service	Staff expertise	Opportunity of better use and spread of expertise	A
	Reliability	Subject to funding	A/G
	IT	Ditto	A/G
Cost	Affordability	Deliverable: subject to additional funding for unavoidable costs. Greatest benefits from additional investment.	A
Implementation/timing	Deliverability	Would take time to deal with HR issues or new legislation in particular	A
Staff/stakeholder impact		Subject to resolution of NMRW issues would be welcomed. Without such resolution, concerns would be raised	G
Governance	Stability	Once implemented	
	Deliverability		A

# Conclusion

The working group has highlighted some positive benefits from the option of a merger and is supportive in principle of merger between Cadw and the Royal Commission.

The working group can see a route forward towards a merger but has highlighted some key issues that need to be further clarified and resolved before a final view can be taken.

These include:

- The need for an outline business case to fully demonstrate the benefits of a merger, value for money etc.; and
- The need to protect the NMRW, with the strongest protection highlighted by the Group being via legislation. This could only be done with the support of the new government, post the May 2026 election, as it would need to be included in the legislative programme of a new government.

The working group recognises that resolving these matters will take some time to progress and implement but advises that the immediate next step is to establish a new implementation group, comprising Cadw and RC representatives.

This implementation group should begin work immediately to further identify areas of closer collaboration, whilst also supporting the work required on the path to a full merger between both organisations.

## Thanks

The working group is grateful to all those who have taken part in the Review, in particular to the staff and Board members of both organisations and of Welsh Government, and those stakeholders who took the time to engage in workshops and to submit their views. Particular thanks go to those Cadw staff who provided the secretariat for the Review.

# Terms of Reference of Working Group and Membership

## Background

In December 2023, [an independent review of Cadw's governance arrangements](#) was published. It includes the following recommendation:

*A review of the relationship between Cadw and the Royal Commission, if acceptable to all parties, should be undertaken by both organisations working together. Approximately eight to nine years ago, both organisations explored potential synergies of closer working. Since then, as evidenced in this review, the strategic context has changed and it would be timely for both organisations to explore options for developing the potential synergies that exist between them in meeting their shared responsibilities and obligations to protect, record and enhance public understanding of the historic environment.*

The then Cabinet Secretary for Culture and Social Justice formally responded to this report on 12 June 2024, agreeing that it would be timely to explore the relationship between the two organisations. She stated that:

*Both organisations need to look closely at their functions and responsibilities and identify synergies and different ways of delivering. All options need to be considered, from more closely aligning work programmes to full amalgamation, as has happened to similar organisations in England and Scotland.*

The purpose of the review is to take forward this recommendation by:

- Mapping and detailing the relevant functions and responsibilities of each organisation and identifying key synergies.
- Explore options for sustaining and improving the delivery of the identified functions and synergies.
- Make recommendations to the Welsh Ministers.

## Structure and role of the Working Group

The working group will be chaired by the Deputy Director Arts and Sport (Welsh Government Directorate of Culture, Heritage, Sport and the Welsh

Language) who will act as Senior Responsible Officer (SRO).

The role of the working group is to:

- establish appropriate governance arrangements to support this review.
- develop and agree a brief which clearly outlines the scope of the work.
- Agree a timeline for the work.
- procure the services of external consultants to gather the views of staff, Commissioners and Cadw Board Members, and key stakeholders.
- involve and engage staff from both organisations in the process.
- review and consider previous reports and work on the relationship between Cadw and the Royal Commission, as well as the amalgamation of similar organisations in England and Scotland.
- involve and consult with relevant stakeholders.
- consider in full the legal, financial and practical implications of the possible options.
- agree a final report, including options, that will be submitted to the relevant Minister responsible for heritage.
- ensure effective communication with staff at both organisations throughout the review.

This work will be supported by a project manager who will be appointed by the SRO.

## Membership

This group will be chaired by Steffan Roberts as SRO. Its membership will comprise:

- Gwilym Hughes, Head of Cadw
- Christopher Catling, Secretary of the Royal Commission
- Manon Maragakis, Culture Division

- Caroline Crewe-Read, Interim Chair of the Royal Commission
- Peter Wakelin, Interim Chair of the Cadw Board
- Alison Gunnion: PCS
- Irene Allen: FDA
- Jane Lancaster: Prospect
- Independent heritage sector representative: Carole Souter

The group will also draw on wider expertise from across the Welsh Government as and when needed e.g. by seeking advice from the Head of the Archives and Libraries Team, the Head of Culture Sponsorship, the Public Bodies Unit, HR, and Legal Services.

Welsh Government will provide the secretariat for this group.

## Meetings

This group will meet at least once a month throughout the review period. More operational matters can be dealt with via email and additional meetings can also be scheduled if necessary to ensure that the review is completed in a timely manner.

## Timeline

As an immediate priority, a project manager/coordinator from Welsh Government will be appointed by the SRO to manage the review and ensure that the work is delivered efficiently and in a timely manner.

The working group will need to agree a detailed timeline for the review leading to the completion of a report for consideration and comment by the Boards of both organisations followed by submission to the relevant Minister for heritage.

Preparatory work will get underway in August and September 2024. This includes:

- identifying key themes to ensure the review is as focused and effective as possible.

- reviewing documentation, correspondence and legal advice relating to the previous review of the relationship between Cadw and the Royal Commission, which took place approximately ten years ago.
- identifying key stakeholders whose views should be sought as part of the review.
- procuring the services of independent consultants to facilitate and lead staff workshops and consult Commissioners and Cadw Board Members, and key stakeholders.

## Dependencies

While the review of the relationship between Cadw and the Royal Commission stands alone, the Director of Culture, Heritage and Sport and the Head of Cadw will ensure alignment where necessary with the wider Cadw governance workstreams. While it is important to take account of emerging discussions, including those relating to the role of Cadw's Board, no dependencies have been identified which would delay this group's work from getting underway.

## Reporting

This group will report to the relevant Minister responsible for heritage who will be provided with regular updates from officials. The group will also provide regular update reports to the Steering Group established to oversee the implementation of the wider recommendations from the Cadw Governance review. The final report and recommendation(s) will be submitted to the Minister along with covering advice provided by officials. The views of the working group will be reflected in this advice.

## Budget

The majority of the project management and secretarial work will be undertaken 'in house'. However, a small budget will need to be identified for the external consultants that will help with the consultation exercise with staff and stakeholders and to support any legal advice that may be required.

# Functions of Cadw and the Royal Commission

This summary of complementary work areas and related activities was produced to aid discussion at the staff workshops which took place in October 2024 and has been updated to take account of those discussions

## Complementary work areas

### Understanding

- Understanding the significance and value of historic assets
- Carrying out research to fill in gaps in our knowledge and improve our understanding of our historic environment
- Researching future historic environment and conservation pressures including climate change
- Awareness raising, promoting and disseminating shared understanding to public and professional audiences
- Horizon scanning

### Protecting

- Through policy and advocacy
- Identifying and protecting historic assets of national significance
- Identifying and recording historic assets of international, national, regional and local significance
- Updating and revising undesignated and designated asset protection in response to improved understanding
- Curating and maintaining records and archives to support protection activities

### Sustaining

- Managing change affecting historic assets and the historic environment

- Conserving and managing properties in State care
- Identifying, recording and managing historic assets at risk
- Promoting distinctive regeneration through heritage
- Supporting local authority conservation services
- Supporting governmental and third sector conservation services
- Promoting conservation principles
- Working with historic environment bodies within Wales and further afield
- Working outside of the historic environment sector to raise visibility and awareness of, and advocate for, the historic environment at local, national, UK and wider scale.
- Researching and recording historic assets to inform management
- Curating and maintaining records and archives to support management decisions

### Respecting (Stewardship)

- Setting standards and showcasing good practice
- Providing advice and guidance
- Monitoring implementation of and maintaining standards
- Stimulating supply and demand for heritage management skills (including traditional building skills)
- Providing training

### Core activities to achieve these include:

- **Policy and Designation**
  - Research and recommendations
  - Designation and registration (listing, scheduling, historic parks and gardens, maritime)

- **Survey and investigation of designated and undesignated assets (Thematic projects and site specific)**
  - Desk-based research
  - Archive research. Proactive collection and collation.
  - Oral Histories
  - Characterisation studies
  - Digital Survey (aerial and terrestrial: Photography/ Photogrammetry, GNSS, TST, laser scan)
  - Externally commissioned (e.g. thematic surveys, geophysical survey, excavation, dating etc.)
  - Externally funded projects (e.g. NLHF, AHRC, RDF etc).
- **Planning Advice and statutory consent regimes**
  - Planning casework and advice (terrestrial and underwater)
  - Scheduled Monument and Listed Building casework (Cadw).
- **Historic asset condition surveys**
  - Cadw Monuments at Risk (MAR) and Buildings at Risk (BAR).
  - RC surveys e.g. aerial survey and detailed survey work
  - Heritage crime
  - Climate Change research.
- **Advocacy / Historic Environment Advisory services**
  - Historic Environment / management / conservation / recording advice at all levels e.g within Government, Local Authorities, Internationally, to owners of heritage assets, community groups and public
  - Publishing conservation guidance for owners/ practitioners e.g. “Caring For”; “Understanding”, “Managing” etc
  - Bespoke asset management advice — e.g. management plans and partnership agreements.

- **Financial support**
  - Providing grant support to heritage and conservation bodies including Heneb grant-aid programme (curatorial services, national and regional projects)
  - Providing capital grant aid to projects to conserve historic assets.
- **Conserving and maintaining historic assets in state care (Cadw)**
  - Demonstrating through our actions best practice in investigation, conservation, management and presentation of the monuments in the national collection.
- **Partnership Working**
  - Thematic Projects around specific areas of concern e.g. Climate Change, Places of Worship
  - Committees, advisory groups and forums.
- **Communicating: Advocacy and Raising Awareness**
  - Publications: Reports, articles and books disseminating interpretation from individual site surveys and thematic research projects
  - Conferences, workshops, talks, guided walks, social media etc
  - Providing training
  - Interpretative outputs e.g. websites, animations, digital reconstructions and other digital resources.

All of these activities both add to and are informed and supported by information resources and archives.

- **Record enhancement and creation** (Maintaining a virtuous circle between activity and record)
  - Core record databases e.g. NMRW (Coflein), Cof Cymru, HAD
  - Specialist databases e.g. historic Welsh placenames, chapels, battlefields.



# Paper provided for external workshops

## Options paper

	Current position	Merger	Formal strategic collaboration
Key Features			
Vision	<p>Cadw and the Royal Commission on the Ancient and Historical Monuments of Wales (the Royal Commission) are separate institutions; informal and occasional formal cooperation takes place at operational level, but mainly the two work towards parallel visions.</p>	<p>The objective of a merged service would be to bring together the expertise and positive reputations of both bodies to deliver a single work programme designed to support current and future Welsh Government and sectoral strategic priorities.</p> <p>Such a merger would integrate the functions and activities of both organisations with the aim of improving service delivery and sustaining core services.</p>	<p>Cadw and the Royal Commission would continue as separate organisations with complementary roles.</p> <p>The objective of collaboration would be to identify work areas that could better delivered jointly through formal agreements.</p>
Flexibility	<p>Current model enables the Royal Commission staff to seize opportunities that come along e.g. for raising external funding or forging partnerships with academic and heritage sector bodies in Wales and internationally.</p> <p>As a line Division of Welsh Government, Cadw conforms to governance and structural arrangements for the civil service. The wider review of Cadw's governance arrangements is being examined separately.</p>	<p>The merger model is irreversible but creates a combined staff with greater critical mass to be flexibly deployed.</p>	<p>The collaboration model could be reconsidered at any point or expanded to encompass additional services or wider partnerships, including other members of the Historic Wales Strategic Partnership or the wider heritage sector in Wales.</p>
Governance	<p>The Royal Commission's aims are set out in the Royal Warrant and by Welsh Government, which sets the Royal Commission's budgets, remit and KPIs. It is overseen by an expert body of publicly appointed Commissioners. Aspects of its work are also subject to oversight by The National Archives.</p> <p>As a line Division of Welsh Government, Cadw is directly accountable to the Welsh Ministers. A Board of non-executive members provides advice, scrutiny and challenge.</p>	<p>The Royal Commission would be dissolved, and its staff, income, property, rights and liabilities transferred to Cadw.</p> <p>Governance would be simplified by its unification and integration into the Welsh Government structure. The detail of Cadw's governance is currently under review.</p>	<p>Cadw and the Royal Commission would continue to be distinct and separately funded entities that would evolve in the light of changing challenges and opportunities.</p> <p>The oversight arrangements currently in place for the Royal Commission would continue.</p>

<b>Administration and terms and conditions</b>	<p>The Royal Commission is managed by a Secretary and administrative staff and with services provided by Welsh Government including finance, internal audit, call-off contracts and PCSPS pensions. Staff are analogued to Welsh Government in terms and conditions. The Royal Commission occupies offices, public reading room and archive storage provided by the National Library of Wales.</p> <p>Cadw is managed by a Deputy Director and administrative staff fully integrated with Welsh Government.</p>	<p>Cadw and the Royal Commission would continue to benefit from services provided by Welsh Government, and no significant administrative costs or savings would be anticipated. Staff would transfer from the Royal Commission on precisely the same terms and conditions.</p> <p>It is assumed that the offices, public reading room and archival stores would continue to be provided by the National Library.</p>	<p>Existing administrative arrangements would be unchanged.</p>
<b>Expert guidance</b>	<p>The Royal Warrant requires the appointment of Commissioners, appointed for their relevant archaeological and architectural expertise, to set the Royal Commission's strategic objectives.</p> <p>Cadw has an internal Board which supports, scrutinises and monitors its strategic direction, business plan and standards. The non-executive members are appointed on the basis of expertise relevant to Cadw's key functions.</p>	<p>Commissioners would cease to exist. The Cadw board would be expanded to include additional members to provide a wider knowledge base.</p>	<p>There would be no change to the roles of the Cadw Board or Commissioners.</p> <p>The existing business arrangements that align the Royal Commission processes with those of Welsh Government would continue. Sponsorship of the Royal Commission would remain with the Culture Division sponsorship team, aligned with other arm's-length bodies.</p>
<b>Operational planning</b>	<p>In common with other arm's length bodies, the Royal Commission receives a remit letter from Welsh Government at the start of each five-year Senedd session setting out what the Royal Commission is expected to do in return for its grant-in-aid. The Royal Commission's operational plan and agreed KPIs are reviewed at quarterly intervals.</p> <p>Cadw's operational plan is informed by its statutory responsibilities and the Welsh Government's current priorities and Programme for Government. A draft annual plan is prepared by Cadw staff with input from the Cadw Board and submitted to the Welsh Ministers.</p>	<p>A new integrated business plan would be drawn up, with a new organisation chart and reporting lines.</p> <p>The National Monuments Record for Wales and the Royal Commission's work of research and recording would become operational priorities for the merged body.</p> <p>The roles undertaken by the 23 FTE staff transferring from the Royal Commission and the circa 250 roles in Cadw would be aligned with the widened operational plan for the organisation as a whole.</p>	<p>The complementary areas of work that have already been identified through joint staff workshops would serve as the basis for agreeing a set of tasks that could be delivered jointly subject to funding, capacity and the agreement of the respective boards.</p> <p>Formal agreements would be developed with clear delivery objectives. Project management teams would define tasks, allocate responsibility and monitor progress.</p> <p>The Historic Welsh Placenames database provides a model for such agreements.</p>

## Key Considerations

<b>IT flexibility</b>	<p>The Royal Commission is free to develop digital tools and manage its own storage and back-up subject to the safeguards of Cyber Security, which is achieved through external audit and certification, monitored by Welsh Government's Cyber Security team.</p> <p>Cadw's ICT applications must comply with the Welsh Government's Cyber Security requirements.</p>	<p>The Royal Commission's existing suite of ICT applications might raise compatibility and security issues within Welsh Government systems.</p> <p>Among the challenges that might be encountered, the Welsh Government's Cyber Security policies might reduce the scope to develop shared solutions to meet the specialist needs of the historic environment sector.</p>	<p>The independence of the Royal Commission's IT systems outside the GSI network provides the flexibility to develop and deploy the range of IT systems and services specific to the Royal Commission's functions.</p>
<b>Public records</b>	<p>The Royal Commission maintains the National Monuments Record of Wales, which is a statutory place of deposit under the Public Records Act and its activities are subject to audit and certification by The National Archives at five-yearly intervals under TNA's designation scheme.</p> <p>All Cadw records need to conform with the Welsh Government's record management policies, procedures and guidance. However, arrangements are made for key records that are generated by Cadw staff and contractors, and relate to the historic environment of Wales, to be deposited with the NMRW.</p>	<p>The National Monuments Record of Wales is a place of deposit under the 1958 Public Records Act. Care must therefore be taken to comply with the Act in any proposed changes, as well as to ensure that arrangements continue for physical and digital public access.</p>	<p>Remaining under the management of an independent Royal Commission would provide assurance that the records would continue to be outside direct ministerial control.</p> <p>Full public access — both digital and physical — will continue.</p>
<b>Stability and sustainability</b>	<p>The Royal Commission's core functions have been under pressure for many years because of funding cuts and reductions in capacity (from 54 FTEs in 2014 to 23 FTEs in 2025). The decline impacts on morale and the ability to recruit and retain staff and Commissioners.</p> <p>Cadw has been subject to periodic reviews and its status has changed from Executive Agency to a line Division of Welsh Government and it has been subject to funding cuts. However, as a body responsible for a large, historic estate and with many of its functions set out in legislation, Cadw's functions are relatively secure.</p>	<p>Questions of the Royal Commission's future have been raised periodically and this has been a cause of instability, which would be resolved if a merger was decided. Changing priorities in government and pressure on resources could still impact on future work programmes.</p>	<p>With both organisations under pressure to undertake their core work and tackle new priorities, formal collaboration would add to the overall burden and challenge.</p> <p>The relationship between the two bodies could be revisited at a future point, especially if collaboration does not meet expectations, thus prolonging the uncertainty.</p>

<b>Career progression</b>	<p>The Royal Commission is a small organisation and career progression opportunities are limited. Budget constraints over the last decade have led to the freezing of posts when staff leave or retire.</p> <p>Staff in Cadw benefit from being a member of one of the largest Divisions of Welsh Government with c 250 roles. They also enjoy the opportunities for career progression offered through the wider civil service.</p>	<p>The larger merged organisation would offer more opportunities for career progression for specialists, and there would be new opportunities for the Royal Commission staff to take up roles in the wider civil service</p>	<p>In such a small organisation, career progression opportunities for the Royal Commission staff are limited. However, given that the Royal Commission staff are analogued with Welsh Government, arrangements might be explored for cross-organisational secondments or eligibility to apply for permanent appointments on equal terms.</p>
<b>Policy development</b>	<p>Cadw consults the Royal Commission on the same basis as it would consult any other stakeholder.</p> <p>As a line Division of Welsh Government, Cadw benefits from direct relationships with Ministers and policy colleagues elsewhere in Welsh Government. (This was a key reason why it was decided in 2017 that Cadw should remain within government.</p>	<p>Staff from the Royal Commission could have greater opportunity to contribute to the development of historic environment policy and to interact with officials from other divisions.</p>	<p>Outside of government, the Royal Commission staff will not have the same degree of influence but a closer relationship would enhance its ability to feed in advice to other government departments (for example on marine issues or place names) and leave it the freedom to contribute through formal consultations.</p> <p>Cadw's role in policy development would be unchanged.</p>
<b>Skills development</b>	<p>Both organisations encourage skills development and training, both specialist and generic.</p> <p>Both organisations have strong track records in providing skills development for others, for example through specialist seminars, learning resources and work experience.</p> <p>Cadw staff benefit from the wide range of skills development opportunities available across the civil service.</p>	<p>All staff in a merged organisation would have the opportunity to learn new skills through working alongside each other.</p> <p>A slightly larger Cadw with a slightly widened skills base might provide more opportunities for apprenticeships, internships, work experience, formal and informal learning activities and volunteering opportunities.</p>	<p>This is an area over which Cadw and the Royal Commission have collaborated successfully in the past (the NLHF funded Unloved Heritage project, working with young people) and opportunities could be taken for deeper collaboration in the future.</p>
<b>Conservation services</b>	<p>The Royal Commission's conservation advice is sought out by others because it is seen as authoritative and staff are recognised to be experts in their field, with a pan-Wales understanding. It is currently able to provide advice freely without prejudice to the statutory roles of Cadw.</p> <p>Cadw has specialists and policy leads across all aspects of the historic environment. It also has conservation practitioners responsible for the 131 properties in the care of the Welsh Ministers.</p>	<p>A merged body would be able to give consistent advice to local authority and other heritage bodies based on a unified approach to conservation policy and standards. However, the ability of the Royal Commission staff to offer divergent views or provide advice without prejudice to ministers could be compromised.</p>	<p>Attempts to achieve formal collaboration have proved challenging in the past often taking many months to reach a resolution.</p>

<b>Advocacy</b>	<p>Staff at the Royal Commission and Commissioners act as advocates for the historic environment through their work as trustees and committee members of heritage bodies and through their journalistic and social media activity.</p> <p>Cadw staff are widely recognised for their authoritative expertise. They are able to advocate to and for ministers. However, they must avoid any perception of conflict of interest and cannot advocate in ways not already approved by ministers. .</p>	<p>The civil service code, and the requirement to avoid conflicts of interest, could restrict the opportunities for staff to serve as trustees and committee members of heritage bodies and inhibit their ability to share opinions and information publicly through journalistic and social media activity.</p>	<p>The Royal Commission staff and Commissioners can continue to take an independent position on heritage issues, participate in other bodies and serve as advocates for the historic environment.</p>
<b>Cost and affordability</b>	<p>There would be little of no additional cost if the status quo was maintained.</p> <p>However, should key functions of the Royal Commission fail due to lack of resource in the future, alternative arrangements would need to be put in place for delivery at possibly significant cost.</p>	<p>The delivery of the merger would require short-term capacity within the senior management of Cadw and the Royal Commission. There will be external costs — for example obtaining specialist legal advice, scoping IT compatibility and redevelopment to allow all platforms to work cohesively. Given the administrative services that the Royal Commission already shares with Welsh Government, savings in operating would be small, though there could be longer term efficiencies and value for money benefits through integration of services and the closer alignment of priorities and activities.</p>	<p>To develop a successful model, capacity would need to be identified within the senior management of Cadw and the Royal Commission.</p>
<b>Immediacy</b>	<p>Current arrangements would continue.</p>	<p>Merger would require a clear and detailed model to be developed, the Royal Warrant to be dissolved, and possibly new legislation to be introduced. If so, this would take time and resource, as well as the need to identify a legislative slot in the Senedd legislative programme. It may be possible to take elements of the work forward initially informally, for example, transferring the staff of the Royal Commission into Cadw prior to the Royal Warrant being dissolved.</p>	<p>Work could begin on identifying collaborative projects quickly, but may take some time to come to fruition. Individual capacity of staff would be the deciding factor.</p>

# Feedback from staff workshops

## Day 1: 23 October 2024

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### Session 1: Workshop objectives

- To identify the complementary services that Cadw and the Commission deliver in respect of survey, investigation, research, Historic Environment advice and managing Heritage at Risk.
- To identify priorities for the next 3,5 and 10 years.
- To consider how the different Cadw/Commission operating models (A: stay as we are; B: closer collaboration; C: merger within Welsh Government) might affect our ability to deliver these functions including identifying opportunities and risks.

### Workshop Question One (All)

#### Complementary services and activities

A draft set of complementary services and activities was discussed in detail and some additions made. In particular it was thought that more emphasis was needed on the role of advocacy on behalf of the historic environment outside the sector. This might include involvement with policy development and engagement with wider policy areas within the Welsh and UK Governments, local authorities and society more broadly. Standard setting and monitoring was also thought to need more visibility, along with the importance of protecting and understanding undesignated assets — particularly in the maritime area. Staff also felt that work on historic place names should be included. There was some discussion of the relationship between Historic Environment Records and the NMR and the need for clarity of roles in this area.

These points were taken on board in a revised note.

### Workshop Question Two

#### (Archaeology and Buildings groups)

**What are our short (3 year), medium (5 year) and long (10 year) Priorities?**

### Workshop Question Three

#### (Archaeology and Buildings groups)

**What are the opportunities and risks presented by the three Cadw/Commission operating models?**

These group discussions produced a range of priorities for thematic area of work — Survey, Investigation, Research; Historic Environment Advisory Services and Heritage at Risk - for the time periods specified and Opportunities and Risks for each area of activity for each of the three organisational options under consideration — ie Policy and Designation; Survey and Investigation; Planning Advice and Statutory Consent Regimes; Historic Asset Condition Surveys; Conserving and Maintaining Historic Assets in State Care; Partnership Working; Communicating and Record Enhancement and Creation. These were then fed in to the on-going development and assessment of the models.

### Outreach & Engagement

#### Breakout room 1: Digital Outputs and External Funding

Overall — there was a strong feeling that closer working would benefit both Cadw and the Royal Commission more than a merger. It also became apparent that neither organisation was fully aware of the details of what the other did.

##### Immediate opportunities:

- *Improve the information flow and encourage early discussion.*
- *Improve the accessibility and ease of locating digital resources.*
- *Assess the possibilities and risks of charging for historic environment services.*

##### Main topics of discussion:

- Flexibility
- Size and scale
- Digital outputs
- Interpretation
- External funding
- Monetizing services.

#### Breakout Room 2: Engagement, Exhibitions and Events

Many outreach activities lend themselves easily to greater collaboration between Cadw and the Royal Commission and there is a recent history of positive collaboration between the two bodies at national events. The breakout group recognised that there were synergies deriving from our roles in our heritage sector that could be strengthened. It was felt that these synergies derived from each organisation's own distinct identity whose strengths could be broadened by joint working.

It was again clear that neither organisation is fully aware of the details of what the other does.

### The main topics of discussion focused on identifying opportunities for closer working:

##### Education:

- Promotional opportunities
- Volunteering & Skills
- Events
- Publications
- Exhibitions
- Conclusion.

It needs to be emphasised that **very good working relationships between both organisations in this area of work already exist**, with many successful previous joint engagements. It was agreed that closer working together would benefit both organisations substantially. It was felt a merger could erode the separate specialisms and expertise that create the synergies vital for successful joint working.

### Workshop 3: Information Management

##### The group discussed:

Areas of overlap between both organisations' information management responsibilities and data.

How infrastructure and resources for data and information management might be shared or distributed across the two bodies.

Whether there are specialisms and expert knowledge in information management that could be shared across both organisations.

Whether there are shared development goals in information management, infrastructure and access and general issues, risks and areas for further investigation.

# Summary of external stakeholder feedback from workshops

The Chair of the working group wrote to around 50 organisations, informing them of the review and inviting them to contribute.

Individual meetings were held with four organisations with the closest working relationships with Cadw/Royal Commission: Heneb, National Library of Wales and Amgueddfa Cymru (these meetings took place in December 2024) and The National Archive (TNA) (February 2025). The meeting with TNA focussed particularly on matters associated with legal and governance requirements related to the National Monuments Record of Wales (NWRW).

21 organisations were specifically invited to attend stakeholder workshops and 19 did so — in some cases a number of team members from the same organisation attended.

25 organisations were contacted, informed of the review, and offered the opportunity to comment and/or attend workshops. Some of these were umbrella organisations with wider memberships. The majority of those who responded indicated that they were content to be kept in touch with progress but did not see the need to take part directly at this stage.

All those attending meetings received a background note summarising the history of the review and the key issues associated with the various options for the future: remaining as is, closer working and merger. That paper provided the key structure for the workshops.

Most of those who participated in meetings or workshops asked for further engagement as the review progressed. A number sent further comments after the meetings themselves.

A brief update note was sent to attendees on 19 March 2025.

## High level messages

All were agreed that the review should prioritise the interests of the people and historic environment of Wales over individual organisational interest. There was no suggestion that this would not happen.

The knowledge and professionalism of both Cadw and Royal Commission staff were widely acknowledged

and appreciated. Participants were concerned to ensure that changes enhanced that knowledge and professionalism and did not put it at risk.

The discussions were positive and engaged and many of the points raised were presented as open questions rather than statements of fixed positions.

There was little discussion of, or enthusiasm for, an outcome which left things exactly as they are now ie there was a widespread — but not universal — perception of the need for change.

Whether closer working or merger was the preferred option was seen to depend upon further information in a number of key areas: eg what changes might emerge in the way in which Cadw operates as a result of other strands of the Cadw Review; what are the legal requirements associated with being a Place of Deposit; how would Cadw/Royal Commission relate to other historic environment/heritage organisations in future; what would be the financial implications of either option and so on.

A number of contributors felt that the current review should consider the relationship of the two organisations to other organisations operating within the historic environment in Wales. In particular, the creation of Heneb in April 2024, **after** the review of Cadw's governance arrangements had reported in December 2023, was seen to have changed the context of this review significantly. It was argued that if only the relationship between Cadw and the Royal Commission were now considered, further work would be needed in the near future to consider this wider context.

## Further baseline information needed to inform the review

A number of stakeholders wished to see a full functions analysis for both organisations and asked to be able to contribute to the development of such analyses. This was seen as a key means of ensuring that future changes did not inadvertently overlook any key activities or responsibilities — whether or not there were current projects underway in a given area. (The analysis carried out in 2013/14 forms a useful starting point for this work).



## Issues to be addressed in proposals for the future

Development of a genuinely **shared vision/visions**, with clear and well understood values and goals, whether the two organisations remained separate or merged. This was seen as essential to assist with work to eliminate any overlapping responsibilities, identify gaps in provision and ensure compatibility of plans.

**Compatible organisational and technical systems**, whether in facilitating public access to data; providing input to the planning system or undertaking, recording and publishing research.

**Maintaining flexibility**, currently enjoyed particularly by the Royal Commission, to respond quickly to opportunities and threats, to test and trial new approaches, particularly in relation to digital technology, and to seek external funding sources.

**Legal and regulatory matters** including the archives accreditation status of the Royal Commission, as well as its status as a Place of Deposit.

Protection of the **ability to advocate** for the sector, and

Protection of current **funding** and opportunity to argue for increased baseline and project funds in future.

## Workshop 1: 9 January 2025

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### Summary of main themes

#### 1. Focus of the review:

- The review should prioritise the best interests of the historic environment in Wales over individual organizational interests.
- Ensuring the best interests of the people of Wales with a need to consider public benefit and taxpayer value.
- A mapping exercise around functionality should be undertaken to ensure the right course of action. This should be across the sector to take account of the synergies with other stakeholders and organisations.

#### 2. Accessibility and Data Management:

- Challenges in accessing data and the need for clearer signposting and merging of databases.
- Importance of making data more accessible and user-friendly.
- Issues with accessing and sharing sensitive documents and data.
- The need for formal agreements to facilitate better data sharing and collaboration.
- Concerns about the management and accessibility of records and archives if the Royal Commission is absorbed into Cadw.
- Maintaining public access and ensuring records remain accessible.

#### 3. Large-Scale Projects and Funding:

- Concerns about maintaining independence and flexibility to pursue large funding sources.
- Success of large-scale projects like Cherish and the need for more such initiatives. If the organisations merge would this reduce future funding opportunities and the ability to undertake large projects.

#### 4. Archive Management:

- Issues with the deposition and accessibility of archives.
- Consider legislative requirements and ensuring changes do not jeopardize the status of the Royal Commission as a place of deposit or an accredited archive service.
- Need for smoother processes and better collaboration between organisations to manage archives effectively.
- Need for better links and transparency in data and archive management.

#### 5. Research:

- The Royal Commission's strength is research and the potential risks of losing this in a merger.

#### 6. Experience in England:

- Lessons from the absorption of the Royal Commission by English Heritage, including the importance of aligning objectives and careful planning for mergers.

## **7. Closer Working Arrangements:**

- Discussion on the potential benefits and drawbacks of formal strategic collaboration versus a merger.
- Concerns about resource limitations and the effectiveness of closer collaboration without additional funding.
- Benefits of mergers, including enhanced work, stronger collaboration, and new perspectives.
- Challenges of maintaining these benefits in a dispersed organization with different working patterns.
- Consider unintended consequences and real-world responsibilities in any organizational changes.

## **8. Financial and Administrative Considerations:**

- Evaluating potential financial benefits from a back-office perspective.
- The need to quantify financial benefits over time and reduce complexity by merging systems.
- Importance of driving cost efficiencies and eliminating duplication.

## **9. Advocacy and Restrictions:**

- Potential restrictions on advocacy and communication if an organization moves closer to government.
- Risks of losing advocacy roles.

## **10. Specialist and Independent Advisory Services:**

- Need for an independent archaeological advisory service outside of government, especially in relation to planning.
- Safeguarding the Commission's work in maritime and aerial archaeology.
- Differences in responses from the Royal Commission and Cadw in relation to casework, with concerns about the quality and perception of responses if a merger leads to a single response.

## **11. Digital Strategy and Investment:**

- Importance of digital strategy and investment in digital access, digitization, and AI.
- Advantages of a single organization in making a stronger case for investment and managing data security.

## **12. Standards and Quality Outcomes:**

- Maintaining standards and delivering better quality outcomes for society.
- Enhancing the effectiveness and efficiency of the organizations involved.

## **13. Charitable Status:**

- Potential impact on the charitable status of the Royal Commission if it is absorbed into Welsh Government.
- Addressing this issue in future discussions and notes.

## **14. Constructive Conversation:**

- Appreciation for the constructive and helpful discussion.
- Positive collaboration and the opportunity to refresh, reinvent, and reform the organization.

## **15. Next Steps:**

- Continuing the workshop to gather more information, perspectives, and suggestions.
- Incorporating feedback into the process and keeping participants informed about progress and outcomes.

### Summary of main themes

#### 1. Public Benefit, grassroots and community impact:

- Emphasis on the public benefit provided by both organisations.
- Consideration of enhanced public benefit through potential merger or collaboration.
- Reflection on the impact on grassroots activities and community engagement.
- Importance of public perception and engagement at the community level.
- Importance of considering the well-being of future generations in heritage work. Ensuring that heritage efforts align with future generations' goals and provide lasting benefits.

#### 2. Vision and Values Alignment:

- Ensuring that both organisations have a shared vision for supporting heritage in the long term.
- Addressing potential tensions and differences in values and goals such as climate change, race equity, language and culture, and social cohesion.

#### 3. Philosophical and Practical Outcomes of Merger:

- Consideration of the philosophical and ethical aspects of merging organisations.
- Ensuring a unified organisational identity post-merger.

#### 4. Funding and Financial Constraints:

- Clarification that the review does not come with additional funding — but the aim is not to make financial savings.
- Need to manage expectations about financial support and potential benefits.
- Need for joint resourcing and understanding the financial pressures on both organisations.
- Concerns about the financial burden and capacity to deliver collaborative projects.

#### 5. Consultation, Policy Advice and Listed Building Consent:

- Practical roles fulfilled by both organisations in the planning system. The Royal Commission provides detailed comments on LBC applications, including background and context. Cadw's responses are shorter and factual.

#### 6. Publications:

- Importance of publications produced by the Royal Commission. Need to ensure continuity of such work post-merger.

#### 7. Research:

- Importance of integrating research data into planning processes to improve decision-making.
- Importance of research contributing to public benefits and being embedded in organisational goals.
- Potential conflicts of interest in joint research projects, especially regarding scheduled monuments.
- Decision-making processes around interventions and excavations.

#### 8. National Monument Record

- Concerns about the implications of merging the National Monuments Record with government control.

#### 9. Continuation of Status Quo vs. Change:

- Concerns about whether closer working arrangements would simply continue the status quo.
- Desire for clarity on what changes and benefits closer working would bring.
- Intention to formalize joint planning to avoid duplication and identify gaps.
- Use of formal project management techniques to ensure accountability and delivery.
- Concerns about the stability and future of staff within the Royal Commission.
- Potential benefits of being part of a larger organisation for staff development and stability.
- Concerns about the long-term functionality and identity of the Royal Commission in a merged organisation.
- Fear of losing non-statutory elements and public benefits due to financial pressures.
- Difficulty in providing absolute guarantees for the future of merged organisations.
- Importance of identifying and preserving key functions of both organisations.

## **10. Strategic Collaboration and Structures:**

- Importance of having resources and structures in place for effective strategic collaboration.
- Examples of successful formal collaborations and the need for commitment at all levels. Gwynedd and Eryri have a strategic collaboration around tourism that could be considered as a model.
- Recognition that collaboration is not cost-neutral and requires effective resourcing.
- Concerns about the lack of parity between the two organisations and the impact on collaboration.
- Need to consider collaboration with the wider heritage sector in Wales.
- Easier logistical collaboration with the Royal Commission from a university perspective.
- Concerns about the changing focus of Welsh Government dependent on political priorities and its impact on research collaboration.

## **11. Funding and Additionality:**

- Concerns about how a merger might affect existing funding streams. Concerns about the ability to do more with reducing resources.
- Concerns about double funding and additionality in heritage projects.
- Ensuring projects are not duplicating government-funded initiatives.
- Need to prioritise activities and manage expectations about what can be achieved.

## **12. Partnership Projects:**

- Examples of successful partnership projects (e.g. Pen Dinas project, CHERRISH project).
- Evaluating how the different models — merger and collaboration — might impact project effectiveness.

## **13. Wider consideration**

- Challenges in making decisions without knowing the outcome of the wider Cadw review.
- Importance of clear communication about form and function, especially with ongoing reviews.
- Recognition that changes in one area can impact others, making decision-making complex.
- Merger offers an opportunity to rethink and reinvigorate the historic environment service for Wales.
- Considering the impact of organisational changes on different parts of the organisation, including properties in care.

## **14. Timing and Disruption:**

- Acknowledgment that organisational changes will take time and focus, potentially disrupting essential services. Will require senior management time and resource.
- Importance of timing changes to minimise disruption to public services.

## **15. Funding and Record Management:**

- Handling of assessments and records from funding applications.
- Need for clarity on where these records are stored and how they are managed.

## **16. Impact of Merger on Independence and Services:**

- Concerns about the Royal Commission's independence and its ability to operate outside government control post-merger.
- Questions about the future of essential services like aerial photography and publications.

## **17. International Profile and Research Ambition:**

- Importance of maintaining a strong international profile for Welsh heritage organisations.
- Concerns about the impact of a merger on the research profile and distinct characteristics of the Royal Commission.

## **18. Future Proofing and Adaptation:**

- Need for future-proofing roles and functions of heritage organisations.
- Consideration of how the sector might evolve over the next 20 years and whether current plans will support this evolution.

## **19. Funding and Record Management:**

- Handling of assessments and records from funding applications.
- Need for clarity on where these records are stored and how they are managed.

## **20. International Profile and Research Ambition:**

- Importance of maintaining a strong international profile for Welsh heritage organisations.
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## **21. Future Proofing and Adaptation:**

- Need for future-proofing roles and functions of heritage organisations.
- Consideration of how the sector might evolve over the next 20 years and whether current plans will support this evolution.

## **22. Access to Information:**

- Ensuring free access to heritage information while managing costs.
- Balancing income generation with the need to keep information accessible to the public.
- Need for a single portal to access various heritage databases.
- Ensuring comprehensive description and accessibility of data held by both organisations
- Importance of making research accessible to the public. Difficulty for individuals in accessing research, information, and data from the two organisations.

## **23. Intellectual Property and Donations:**

- Handling intellectual property rights and donations carefully to maintain public trust.
- Ensuring that donated materials are used appropriately and not for unintended commercial purposes.

## **24. Future of Publishing:**

- Uncertainty about the future of publishing, with a mix of digital and physical formats.
- Potential for joint publishing programs and shared services to support the heritage sector.

## **25. Resource Allocation and Attention:**

- Balancing resources and attention between different aspects of heritage work.
- Ensuring that documentation and research receive adequate focus alongside property management.

## **26. Synergies with Government and Public Priorities:**

- Exploring how new relationships or organisations can take advantage of synergies with other government and public priorities.
- Ensuring that new arrangements do not get consumed by other priorities but remain focused on heritage goals.

# The National Monuments Record of Wales

The Chair of the working group wrote to Wales' national collections held by the three national culture arm's length bodies — Amgueddfa Cymru, the National Library of Wales and the Royal Commission which maintains the NMRW.

The Royal Commission is a designated [Place of Deposit](#) under the Public Records Act 1958 and the records generated by the Commission's surveying and recording activities in the NMRW are subject to the public records legislation. Should merger be identified as the preferred way forward the Welsh Government would have to comply with the statutory requirements set out in the Act.

The benchmark by which the NMRW is judged to be a fit repository to hold such records is the UK-wide Archive Service Accreditation standard. As a Place of Deposit it is imperative that the NMRW continues to maintain its accredited status. Therefore, in addition to these statutory requirements five key principles have been identified for the NMRW. The three options of business as usual, closer collaboration and merger need to be assessed against their ability to:

- Ensure that decisions relating to how the NMRW is managed, including the selection of material for permanent preservation within it, are made independently of any political agenda or influence.
- Enable the processing and cataloguing of collections to recognised professional standards and make this information easily available to researchers.
- Provide full physical and digital public access to the

NMRW.

- Provide appropriate accommodation in terms of environment and security.
- Provide financial protection for the effective maintenance and preservation of the record.
- Ensure the NMRW continues to be managed by appropriately qualified specialist staff who have access to opportunities to maintain and develop their specialisms.

The option of merging with the Government would result in the NMRW, a crucial part of our national collections, coming under the care of the Welsh Government. If a merger is identified as the preferred course of action, it is essential to establish appropriate arrangements and protections to ensure that the NMRW continues to be maintained to the highest standards. Furthermore, decisions regarding its management, particularly the selection of material for permanent preservation in the NMRW, must be made independently of any political agenda or influence. This is vital to ensure that the NMRW continues to fulfill the requirements of an appointed Place of Deposit under the Public Records Act 1958.

	Current arrangements	Potential arrangements if merger taken forward
<p><b>Nature of records held</b></p>	<p>The Royal Commission has been appointed a Place of Deposit to hold specific classes of public records.</p> <p><b>The NMRW archive includes:</b></p> <ul style="list-style-type: none"> <li>– Designated public records deposited with the Royal Commission under the Public Records Act 1958 in both traditional and digital formats (c70% of its holdings).</li> <li>– Assets listed in paragraph 2 of the Schedule to the 1964 Scheme for the regulation of the National Buildings Record for Wales and Monmouthshire (c5%), in relation to which the Royal Commissioners are the Managing Trustees. This element of the NMRW is physically dispersed throughout the collection and it would be difficult (and undesirable) to disaggregate this material from the rest of the archive.</li> <li>– Collections (c. 25%) derived over time from a variety of private organisations and individuals either by gift or deposit (long term loan) in both traditional and digital formats.</li> </ul>	<p>The Welsh Government would need to be appointed as a Place of Deposit to hold the same classes of records. The whole of the NMRW would need to be transferred at the point of merger.</p> <p><i>Records with charitable status</i></p> <p>There could be implications to holding the assets listed in paragraph 2 of the Schedule to the 1964 Scheme for the regulation of the National Buildings Record for Wales and Monmouthshire (c.5% of the NMRW). The Commissioners are currently the Managing Trustees. It is understood that the Welsh Ministers cannot act as the charity trustees of that part of the NMRW which is subject to charitable trusts. If this is the case, independent trustees might be needed. Further understanding of the situation and risk is needed.</p> <p><i>Records donated by private individuals</i></p> <p>The status of records donated to the Commission from private individuals (as opposed to loaned) also needs to be explored. It is unclear if records gifted to the Commission have public records status. This will need to be clarified.</p> <p>We are also mindful that private individuals who donated or deposited records with the Royal Commission as an independent body may have concerns about their records being transferred to ‘government’ and could request that these records are transferred to an alternative archive or returned to them.</p>
<p><b>Governance</b></p>	<p>The Commissioners have overall responsibility for the work of the Royal Commission, including its role:</p> <ul style="list-style-type: none"> <li>– compiling, maintaining and curating the National Monuments Record of Wales as the basic national record of the archaeological and historical environment</li> <li>– identifying, surveying, interpreting and recording all buildings, sites and ancient monuments of archaeological, architectural and historic interest in Wales or within the territorial sea adjacent to Wales, in order both to enhance and update the National Monuments Record of Wales</li> <li>– responding to statutory needs by providing advice and information relevant to the preservation and conservation of such buildings, sites and ancient monuments of archaeological, architectural and historic interest: by collecting and exchanging data with other record holders and providing an index to data from other sources</li> <li>– promoting the public use of information available in the National Monuments Record of Wales by all appropriate means.</li> </ul> <p>The Royal Commission’s staff report to its Secretary and they all report to the Board of Commissioners on how the NMRW is managed.</p>	<p>Should the Royal Commission merge with Cadw, Welsh Ministers would have overall responsibility for the NMRW. Whichever option is taken forward under the ‘statutory framework’ discussion, it is important to retain the NMRW brand to ensure continuity and provide reassurances of the continued quality of service that will be provided.</p> <p>An internal operating board exists to support, scrutinise and monitor Cadw’s strategic direction, business plan and standards. This is an advisory board, and currently has 4 non-executive members who are appointed through a system similar to public appointments. Each of the non-executive members are recruited for their expertise in areas such as human resource, historic buildings, community involvement and running historic sites. Under a merged model, we envisage that the Board’s membership would be expanded to include a member(s) with relevant expertise in archive management including digital preservation.</p> <p>It is important to ensure that within a merged structure, the specialist staff who care for the NMRW feed into decision-making process relating to managing the archive and allocation of resources. This should be reflected in any proposed staffing structure under the terms of a merger.</p>

**Collections  
Care — Staffing**

It's important to consider the survey and investigation staff responsible for compiling the NMRW as well as the archive library and public enquiries staff who maintain it and ensure that the public have access to the records. These teams work very closely together to enable a strong relationship between record creation and record curation — both physical and digital.

In total, there are \*\* expert members of staff who share responsibility for the NMRW.

The service provided is highly regarded and the service performs strongly against the Archive Accreditation Service standard. This level of performance this must be maintained.

The current level of staff expertise must be maintained and developed to ensure we have the specialist staff and expertise to manage complex digital records. All members of staff can come over to Welsh Government under TUPE arrangements.

It is essential that NMRW continues to be managed by appropriately qualified specialist staff who have access to opportunities to maintain and develop their specialisms.

The ability to continue to work in partnership with other heritage and archival organisations and networks is key to maintaining staff specialisms and ensuring that the NMRW remains current and as accessible as possible to users.

**Collections Care —  
Accommodation**

The Royal Commission and its archives are located in the National Library of Wales' building.

This arrangement ensures that the NMRW is kept in facilities which meet BS4971:2017 and BS EN 16893: 2018 The National Library can also offer specialist facilities such as the freezing of photographic collections which are not available in other repositories in Wales.

To gain and retain its status as a Place of Deposit, the Welsh Government would need to meet the Archive Accreditation Standard for both analogue and digital records.

Under the terms of a merger, the NMRW would remain at the National Library of Wales. Purchasing, building or leasing another building in Aberystwyth and creating specialist storage facilities would not be cost effective. This is also true of any proposals to redevelop the Welsh Government offices in Aberystwyth to house the NMRW. It would be prohibitively expensive to re-create the facilities which the RC can currently access at NLW (e.g on-site conservation suite, equipment for digitising large items, freezer storage etc.).

The Royal Commission is running out of physical storage space. This is a broader issue for the National Library. Officials are in discussions with NLW as colleagues there develop both short term and longer-term storage plans which will take account of the needs of the NMRW.

We do not foresee that the NMRW will need significant additional physical space for the next few years. By 2030, it's likely that overwhelming majority of records added to the NMRW will be born-digital with ad hoc paper records being received from time to time. This will require investment in a robust digital infrastructure and the RC will need to support to progress towards achieving specific internationally recognised standards for the care of digital collections such as Core Seal Trust in addition to Accreditation.



<b>Users</b>	<p>The Commission's online database, Coflein, is central to its provision and in providing access to its users.</p> <p>It has a search room at the National Library building in Aberystwyth where users can have specialist support to access the NMRW.</p> <p>It also provides a service for local authorities planning departments.</p> <p>During their last archive accreditation review, the Commission staff were applauded for the ways in which different user needs, from diverse communities to business users are considered and met, with positive social and economic benefits across Wales.</p>	<p>It is important to ensure that users continue to receive the level of service that they do currently. In-person visitors can access the NMRW easily in the Commission's search room and they would continue to do so with the NMRW and its staff based at NLW.</p> <p>The co-location of the NLW collections and the NMRW is of real benefit to users. Although the RC has a specialist library, users can also access both the printed and archival resources of NLW at the same time as a visit to the RC. Conversely visitors to NLW can be referred to resources in the NMRW and benefit from the advice of the RC staff on site. Any change to this arrangement would impact negatively on users.</p> <p>There is crossover here with the digital/IT workstream and ensuring that data can be appropriately accessed during the transition phase and as part of 'business as usual' under a merger.</p>
<b>NMRW Associated Costs</b>	<p>Salaries — £421,000</p> <p>Running costs (archive consumables, etc.) — £11,000</p> <p>*Accommodation (including stores, public reading room and archive work area) — £95,000</p> <p>Digital archive — £30,000</p> <p>Data management and public access systems — £40,572</p> <p>Total: £597,572 per annum</p> <p>*Accommodation costs are based on the annual lease costs paid to NLW. This includes office space occupied by other Royal Commission staff. However, the majority of the space leased is taken up by the NMRW (i.e. archive stores, work space, reading room and NMRW staff office space).</p>	<p>An annual budget for the NMRW would need to be allocated within the Cadw budget and kept under review to take account of increasing costs e.g. salary increases, a review of the lease with NLW if additional physical arrangements will be required.</p> <p>In addition to the current costs of approximately £600,000, consideration needs to be given to the recommendations made the digital/IT workstream e.g. there could be a greater cost to buying licences from within government. There is also a need to review current capacity and agree a 'minimum standard of service' e.g. ensuring we have capacity to run the enquiry service 5 days a week.</p>
<b>Statutory framework</b>	<p><i>The Royal Warrant</i></p> <p>The Royal Commission's responsibilities in relation to the NMRW are outlined in its <a href="#">Royal Warrant</a>. This places the NMRW on an equivalent of a statutory basis.</p> <p><i>The Public Records Act 1958</i></p> <p>The Royal Commission is a designated <a href="#">Place of Deposit</a> under the 1958 Public Records Act and the records generated by the Commission's surveying and recording activities in the NMRW are subject to the public records legislation. The Commission is also the approved place of deposit for the subject files generated by Cadw.</p>	<p>From initial assessment there are challenges and risks associated with each option which will need to be considered further.</p> <p><i>The Public Records Act 1958</i></p> <p>The Welsh Government would need to become a designated Place of Deposit to hold the NMRW. This means that:</p> <ul style="list-style-type: none"> <li>(i) The Welsh Government would need to request appointment as a place of deposit by the National Archives to hold the specific classes of public records held and collected by the NMRW.</li> <li>(ii) The National Archives would undertake an inspection to ensure suitable arrangements are in place for the preservation of the records and access to them. This would happen at the point of dissolving the Royal Warrant, and therefore the Royal Commission as an entity.</li> <li>(iii) The Welsh Government would also need to make a full re-application for Archive Service Accreditation given the significant changes to the governance arrangements for the NMRW. (The status of the RC may be reduced to Provisional Accreditation during the transition period).</li> </ul>

Potential Framework Models

Option 1 — Transferring the responsibilities outlined in the Royal Warrant to Welsh Ministers via primary legislation.

This would mean dissolving the Royal Warrant and transferring the responsibilities outlined in it to Welsh Ministers via an Act of the Senedd. The responsibilities of Welsh Ministers would be delegated to the Minister responsible for heritage.

Pros	Cons
<ul style="list-style-type: none"><li>– This would place the NMRW on a statutory footing. This option could take account of the Welsh context in a way that a Royal Warrant wouldn't e.g. in its drafting and impact on other legislation.</li><li>– This would be an opportunity to review the content of the Royal Warrant and, if appropriate, update the responsibilities in it before capturing them in legislation.</li><li>– The Historic Environment (Wales) Act already places duties on Welsh Ministers and therefore there are similar precedence.</li><li>– Should an MoU between Welsh Ministers and Cadw be put in place, operational freedoms could be given to officials in the day-to-day management of the NMRW. This is similar to how Cadw undertakes other statutory duties such as designation of historic buildings.</li></ul>	<ul style="list-style-type: none"><li>– Putting statutory responsibilities in legislation is only one lever to get to a desired outcome. Should this option be pursued, it must be considered within the wider context of staffing structures, governance arrangements etc.</li><li>– Placing duties on Welsh Ministers could be seen as a significant loss of independence with politicians making decisions about managing the NMRW, including the nature of the collections held. Different approaches could be taken by different administrations.</li><li>– This option would not address the issues raised in relation to the records with charity status and those donated by private individuals.</li><li>– The Government would need to identify this legislation as a priority for the next term, and a slot would need to be identified through a competitive exercise. If this was identified as a priority for the next government could take up to 5 years to implement. We would need to explore interim arrangements should an administrative merger take place first.</li><li>– There is a risk that amendments would be tabled to the Bill during scrutiny and the Act would not deliver the original objectives. Other undesirable legislative changes could come within scope of Bill.</li></ul>

Option 2 — Maintaining a Royal Warrant with the relevant Minister replacing the Commissioners.

This would be a similar model to that of the Royal Commission on Historical Manuscripts when it merged with The National Archives. The Royal Warrant would continue to exist but Commissioners would be replaced with one single Commissioner. In the case of TNA, the CEO is the Commissioner. In our case, we would keep the Royal Commission on the Ancient and Historical Monuments of Wales as an entity with Welsh Ministers taking on the role of a sole Commissioner. The duties placed on the Welsh Ministers would be delegated to the Minister responsible for heritage. It may be possible to delegate this further to the Head of Cadw.

Pros	Cons
<ul style="list-style-type: none"><li>– This would keep the NMRW on the same statutory footing as present.</li><li>– The Royal Commission would remain as a legal entity which could bring a degree of independence e.g. it would be the Royal Commission that would continue as a Place of Deposit rather than the Welsh Government.</li><li>– Should an MoU between Welsh Ministers and Cadw be put in place, operational freedoms could be given to officials in the day-to-day management of the NMRW.</li><li>– A new Warrant would need to be issued to take account of the changes in Commissioner arrangements. This would provide an opportunity to review and update the responsibilities outlined in the current Warrant (if needed).</li><li>– No requirement to undertake a public appointment process to appoint Commissioners every 5 years.</li></ul>	<ul style="list-style-type: none"><li>– While Welsh Ministers may legally assume the role of Commissioner, strong conventions suggest that this option should be discounted. This is due to the perceived lack of independence, as Commissioners are generally experts in their fields. Consequently, it is uncertain whether this would be acceptable to the Crown or the UK Government.</li><li>– Ministers would hold two roles — their political role within government and the role of Commissioner. They could face significant conflict of interest in certain circumstances e.g. in challenging discussions about the impact of future budgets.</li><li>– Placing duties on Welsh Ministers could be seen as a significant loss of independence with politicians making decisions about managing the NMRW, including the nature of the collections held. Different approaches could be taken by different administrations.</li><li>– This option would not address the issues raised in relation to the records with charity status and those donated by private individuals.</li></ul>

**Option 3 — Maintaining the Royal Warrant as well as a small group of Commissioners who would sit on Cadw’s Board.**

The Royal Commission on the Ancient and Historical Monuments of Wales would remain as the legal entity responsible for the NMRW. The duties outlined in the Royal Warrant would be placed on one or two Commissioners. The small group of Commissioners would ultimately be responsible for the NMRW and would sit on the Cadw Board to ensure coherence with wider policy and feed into the existing mechanisms of advising the Minister responsible for heritage. The Commissioners would be public appointments and the arrangements for their appointment, including their term length, would continue to be outlined in the Royal Warrant.

Pros	Cons
<ul style="list-style-type: none"><li>– This would keep the NMRW on the same statutory footing as present.</li><li>– The Royal Commission would remain as a legal entity with its own governance arrangements.</li><li>– The requirements would be placed on Commissioners rather than Welsh Ministers. This would ensure that decisions relating to the NMRW were made independent of the political agenda of the time and with the necessary expertise.</li><li>– This would bring both independence and continuity with the Royal Commission not Welsh Government being assigned as Place of Deposit under the Public Records Act.</li><li>– A new Warrant would need to be issued to take account of the changes. This would provide an opportunity to review and update the responsibilities outlined in the current Warrant (if needed), as well as the approach to public appointments.</li><li>– The need for Managing Trustees for the records with charity status would be addressed through this option with the small group of Commissioners taking on this responsibility.</li><li>– The potential issues identified relating to records donated by private individuals are also addressed here with independent Commissioners having overall responsibility for the NMRW, instead of Welsh Ministers.</li></ul>	<ul style="list-style-type: none"><li>– Clear governance arrangements and processes would need to be put in place to ensure that members of staff responsible for the NMRW (including the Head of Cadw) reported appropriately to the Commissioners.</li><li>– There could be a risk of conflict between the Head of Cadw and the Commissioners, in particular over resource allocation. The Head of Cadw needs to balance the budget across all of Cadw’s statutory roles.</li><li>– The Commissioners could also face potential conflict of interest on occasion since they would have dual role as Commissioners and members of the Cadw Board.</li><li>– A two tier Board for Cadw would be created, with at least one Board member holding an additional Commissioner responsibility, and being appointed / remunerated differently to the remainder of the Board members.</li><li>– There could be an imbalance in the composition of the Board if there was more than one representative for the NMRW / Survey and investigation work.</li><li>– It is unlikely that this option would be acceptable to Welsh Ministers / Cadw due to the additional complexity that would be introduced, and the perception of unbalance between Cadw’s other statutory duties.</li></ul>

**Option 4 — Dissolving the Royal Warrant and transferring the responsibilities outlined in it to Welsh Government, with the NMRW included in the memorandum of understanding between the Head of Cadw and the Minister.**

Pros	Cons
<ul style="list-style-type: none"><li>– There would be no statutory responsibilities in relation to the NMRW which would provide flexibility to adapt and respond to changing contexts and priorities.</li><li>– The emerging MoU between Ministers and the Cadw CEO could provide a safeguard as it will introduce independence of decision making and has the potential to provide a simpler and in some cases more effective control — including embedding the need for appropriate specialist staff.</li><li>– The process transferring the NMRW would be simpler without the need for legislation or a new Royal Warrant.</li></ul>	<ul style="list-style-type: none"><li>– The NMRW would lose its statutory status and therefore any legal protections. The make-up of the NMRW could be completely changed. The emerging MoU between Cadw CEO and Ministers would provide some protection from a Ministerial decision to change the nature of the archive or to completely disband it. In addition the NMRW would need to meet the accreditation standards of the National Archives.</li><li>– There would be no clear definition or scope for the NMRW which would make it much harder to manage and seek future accreditation.</li><li>– The MoU would not resolve the issue of charity status sitting with National Building Records elements of the NMRW.</li></ul>

# Closer collaboration

## Background

The working group considered two forms of closer collaboration, one lighter touch than the other. Both would require input of time and effort from senior management and staff of each organisation and so would have opportunity costs. To achieve the main benefits of closer collaboration additional funding would be required to support the joint projects which both organisations recognise would be of real benefit to the sector. It has been made clear that such additional funding would have to be bid for in an extremely competitive funding environment and cannot be assumed to be forthcoming.

## Simplified strategic collaboration model

The aim of strategic collaboration between Cadw and the Royal Commission would be to ensure greater clarity, streamlining and sustainability of essential functions for both organisations and in their relation to the wider historic environment sector. The aim of closer collaboration would be to deliver:

- Complementary specialist organisations that contribute strongly to sustainable, high-quality historic environment services for Wales
- Agreed aims and objectives for wider partnerships to deliver efficient national historic environment services in Wales
- Arrangements for a more sustainable workforce with specialist skills safeguarded for the future
- Cadw and the Royal Commission would operate as distinct yet complementary entities with aligned goals. The collaboration would concentrate on areas where their responsibilities intersect, and would be guided by a strategic framework and formal agreements.

	Closer Collaboration
Statutory framework	<p>There would be no change to Cadw nor the Royal Commission’s statutory frameworks and responsibilities.</p> <p><b>The Royal Commission would continue to operate according to:</b></p> <ul style="list-style-type: none"> <li>– The Royal Warrant</li> <li>– The Public Records Act 1958</li> <li>– The remit letter issued by the Welsh Ministers under the Government of Wales Act 2006 and other relevant legislation.</li> </ul> <p><b>Cadw would continue to operate according to:</b></p> <ul style="list-style-type: none"> <li>– The Historic Environment (Wales) Act 2023 and other statutory requirements and international treaties</li> <li>– Ministerial priorities as set out in the Programme for Government.</li> </ul>
Business Planning	<p><b>The majority of the specialist work of each organisation continues without any need for joint planning, for example:</b></p> <p>Cadw continues to provide strategic leadership to the historic environment sector, operate the properties in care, provide visitor services, undertake conservation, respond to statutory consultations, and provide conservation advice and grants</p> <ul style="list-style-type: none"> <li>– The Royal Commission continues to manage and enhance through fieldwork the national collection for the historic environment and to enhance it through fieldwork, accept material from multiple sources.</li> </ul> <p><b>Existing collaborative working would continue, for example:</b></p> <ul style="list-style-type: none"> <li>– Archives — the Royal Commission would continue to manage the archives of Cadw as part of its role as a Place of Deposit for Public Records</li> <li>– Place names — the Royal Commission would continue to be funded to maintain and develop the place names register on behalf of Welsh Government</li> <li>– The Commission would continue to monitor the statutory Historic Environment Record and advise Cadw regarding its management.</li> </ul> <p><b>In an initial strategic collaboration review, Cadw and the Royal Commission would agree how certain functions would be divided between them to give greater clarity for users and avoid any perception of duplication or competition. Where one organisation relies on another for such operations in future, the transition would be supported by an ongoing Service Level Agreement. Potential areas could be:</b></p> <ul style="list-style-type: none"> <li>– Public engagement and lifelong learning</li> <li>– Image licensing and image library</li> <li>– Publications</li> <li>– Planning advice</li> <li>– Buildings at risk</li> <li>– Training for sector.</li> </ul> <p>However, given current pressure on funding levels it will be challenging to identify relevant resource for redeployment to these under-resourced areas.</p> <p><b>Ongoing strategic coordination addresses shared sector views of priorities for online services, research and recording, seeking to optimise the use of resources across universities, Heneb, Amgueddfa Cymru, the National Trust and local authorities as well as Cadw and the Royal Commission and to identify funding opportunities and partnerships. Aspirations might include:</b></p> <ul style="list-style-type: none"> <li>– Scoping and developing a shared national data service for historic environment information with major benefits in service quality and streamlining of editorial practices and cost efficiencies.</li> <li>– Collaborative projects on under-represented aspects of Welsh heritage with multiple outcomes in statutory protection, identification of conservation priorities and enhanced public understanding.</li> </ul>

<b>Governance</b>	<p>Chief Executive of the Royal Commission and Chief Executive, Cadw — work together to develop / consult on business planning, including Service Level Agreements, identifying joint projects and allocating funding and sharing responsibility over the delivery of the projects. The success of collaboration is dependent on a constructive and mutually supportive relationship at this level with clear documentation of expected outcomes. The sponsorship leads from the Culture Division would ensure alignment with the sponsorship arrangements.</p> <p>Commissioners continue to oversee the delivery of the Royal Warrant and the Royal Commission's annual operational plan. Cadw Board advise on the delivery of the Cadw operational plan. The two Boards meet jointly to consider and approve proposals arising from the initial strategic collaboration review.</p> <p>The Secretary of the Commission would continue to be accountable to the Commissioners, who would also continue to report to the Welsh Government via the Culture Sponsorship Team.</p> <p>The Chief Executive of Cadw would continue to be accountable to the Director General responsible for Culture and Heritage for the proper use of public funds and the effective management of the staff of Cadw to achieve the aims and objectives set by the Welsh Ministers.</p>
<b>Sponsorship</b>	<p>Both organisations have capacity issues in meeting their current core responsibilities. Some transfer of functions between them, as envisaged above, should provide some opportunities to focus resources on existing centres of excellence that would help safeguard specialist skills for the future. However, savings are likely to be very small, if identifiable, and additional resources may be required to enhance existing services or develop additional projects.</p> <p>Additional capacity could support closer collaboration and would provide more opportunities for the sharing of resources across projects, supporting staff development in both organisations and the transfer of skills. Subject to resources, there could be more opportunities for staff to work across the boundaries of the organisations, to provide career development opportunities, share learning and safeguard specialist skills.</p>
<b>Users</b>	<p>Users would go to the Royal Commission for archive and research services and to Cadw for heritage policy, visitor services, conservation advice, grants and support . Added value could come from additional joint projects.</p>
<b>Associated Costs</b>	<p>No additional costs would be envisaged under this model, other than the opportunity costs of staff time in establishing new working arrangements and creating regular joint meetings. Both organisations would have separate budgets to manage as appropriate. The Royal Commission would be free to seek external funding and build partnerships with the academic, voluntary and public sectors. Cadw would bid for funds in the usual way and could consider bidding jointly with the Commission and other bodies for major sector-wide projects such as for the enhancement of joint record systems.</p>

SWOT analysis of how the Royal Commission and Cadw could deliver sustainable, high-quality historic environment services for Wales by working in formal collaboration.

<div><b>Strengths</b></div> <div>Each organisation is enabled to concentrate on delivering its complementary specialist role with dedicated resources.</div> <div>The National Monuments Record remains outside government control like the other national collections.</div> <div>The independence of the Royal Commission's IT systems outside the GSI network provides the flexibility to develop and deploy the range of IT systems and services specific to the Royal Commission's functions and to work with other partners.</div> <div>Many users would be happy if the Royal Commission were to remain independent as a collection and research body, although concerns about its ability to deliver would remain.</div> <div>The Royal Commission is seen as a valuable voice, independent of government, to advocate for the historic environment.</div>	<div><b>Weaknesses</b></div> <div>Both organisations continue to face significant financial challenges under all models, but this model enables some efficiencies and small-scale redeployment of responsibilities within the organisations. New collaborative projects would require additional resources.</div>
<div><b>Opportunities</b></div> <div>A collaborative approach can lead to a more streamlined and effective service and greater clarity for users.</div> <div>Collaboration could be reconsidered or expanded to include additional services or partnerships, including Heneb and the members of the Historic Wales Strategic Partnership.</div> <div>Opportunities for shared training programs for staff and volunteers, leveraging the strengths and expertise of both organisations.</div> <div>Joint initiatives can foster greater public engagement and awareness, leveraging the strengths of both organisations in education, events, and publications.</div> <div>Opportunities for collaborations with academic and heritage sector bodies and funding programmes in Wales and internationally, enhancing the scope and impact of projects.</div> <div>The Royal Commission's independence allows it to pursue income sources through various channels.</div>	<div><b>Threats</b></div> <div>Continual uncertainty regarding the future of the Royal Commission would continue to impact staff morale and its ability to recruit and retain specialised talent.</div>



# Closer collaboration full Model

The aim of strategic collaboration between Cadw and the Royal Commission would be to ensure the future sustainability of essential functions. Through closer collaboration we would wish to put in place in relation to Cadw and the Royal Commission:

- The structure for sustainable, high-quality historic environment services for Wales.
- Agreed aims and objectives for efficient national historic environment services in Wales.
- Arrangements for a sustainable workforce with specialist skills safeguarded for the future.

Cadw and the Royal Commission would operate as distinct yet complementary entities with aligned goals. The collaboration would concentrate on areas where their responsibilities intersect, guided by a strategic framework and formal agreements.

	Closer Collaboration
Statutory framework	<p>There would be no change to Cadw nor the Royal Commission's statutory frameworks and responsibilities.</p> <p><b>The Royal Commission would continue to operate according to:</b></p> <ul style="list-style-type: none"><li>– The Royal Warrant</li><li>– The Public Records Act 1958</li><li>– The remit letter issued by the Welsh Ministers under the Government of Wales Act 2006 and other relevant legislation</li></ul> <p><b>Cadw would continue to operate according to:</b></p> <ul style="list-style-type: none"><li>– The Historic Environment (Wales) Act 2023 and other statutory requirements.</li><li>– Ministerial priorities as set out in the in their programme for government.</li></ul>
Business Planning	<ul style="list-style-type: none"><li>– Cadw and the Royal Commission would work to identify areas for collaboration and prepare clear objectives to cover a 3-to-5-year period (to be agreed by both Boards and the Minister). This would help address the second objective outlined in the paragraph above which is to agree aims and objectives for efficient national historic environment services in Wales (in relation to Cadw and the Royal Commission).</li><li>– On an annual basis a joint business plan would be developed to support the areas identified for collaboration and the overarching 3-to-5 year objectives. The joint plan would clearly indicate which workstreams would be delivered by Cadw, the Royal Commission or jointly. The plan would also identify any budget allocation by Welsh Ministers or by either organisation to deliver the outcomes.</li><li>– The joint business plan would form part of Cadw and the Royal Commission's individual annual operational plans. Cadw's wider operational plan would cover areas beyond joint work with the Royal Commission e.g. commercial plans, conservation of the sites in the care of Welsh Ministers, visitor services, corporate responsibilities. The Royal Commission's wider operational plan would address its own corporate objectives, any aspects of responding to the Welsh Government remit letter which sit outside the joint working with Cadw, and flexibility to take forward work which meets the Royal Warrant but sits outside the partnership with Cadw.</li><li>– Both Cadw and the Royal Commission's Boards would approve the joint business plan as well as the broader annual operational plan for their respective bodies in which the joint plan would sit. The operational plans (including the joint business plan) would also go to the Minister for agreement. Sign off on the joint business plan would only need to be requested once.</li></ul>

## Governance

*Commissioners* continue to oversee the delivery of the Royal Warrant and the Royal Commission's annual operational plan, including the aspects of the joint business plan specifically allocated to the Royal Commission.

*Cadw Board* — advise on the delivery of the Cadw operational plan and the aspects of the joint business plan allocated specifically to Cadw.

*Chief Executive of the Royal Commission and Chief Executive/Deputy Director, Cadw* — work together to develop the joint business plan, including identifying joint projects, allocating funding and sharing responsibility over the delivery of the projects. This would require both formal and informal interaction. The sponsorship leads from the Culture Division would have a role to play in supporting the relationship between the two CEOs and ensuring alignment between the processes which underpin the Cadw/Royal Commission partnership and the sponsorship arrangements.

*The Chairs of the Boards* — The joint objectives for Cadw and the Royal Commission would be managed on a day-to-day basis by the Chief Executive, Royal Commission, and Chief Executive, Cadw, and their staff. They would also be monitored by regular meetings between the Chairs of both Boards who would represent the wider views of their Boards. During these meetings, the Chairs would also reflect on how the closer collaboration model is working.

*Joint meetings* of the Cadw Board and Commissioners to be held at least once a year to review the annual joint business plan, reflect on the progress made during the previous year and monitor how the closer collaboration model is working.

Additional joint Board meetings could be held to monitor progress against the delivery of the plan and to identify areas where further collaboration would be possible. However, we envisage that regular meetings between the Chairs of the Boards following individual Board meetings would be the main forum for such discussions and to monitor progress against the joint objectives.

*The Secretary of the Commission* would continue to be accountable to the Commissioners. They would also continue to report to the Welsh Government via the Culture Sponsorship Team. The Secretary would attend Cadw's quarterly Leadership meetings and joint Cadw/Royal Commission SET meetings would be established to monitor progress against the joint business plan and reflect on how the closer collaboration model is working. These could be monthly or bimonthly. The CEOs of Cadw and the Royal Commission would take turns to chair these joint meetings with the Welsh Government Director responsible for Culture and Heritage attending/chairing on a biannual basis to provide additional overview and challenge. As referenced below, a member of the sponsorship team may attend these meetings as an observer to help ensure alignment and consistency in understanding.

*The Chief Executive of Cadw* would continue to be accountable to the Director General responsible for Culture and Heritage (currently this is the Director General for Education, Culture and Welsh Language) for the proper use of public funds and the effective management of the staff of Cadw to achieve the aims and objectives set by the Welsh Ministers.

<b>Sponsorship</b>	<p>The sponsorship function for the Royal Commission would continue to sit with the Culture Sponsorship team. The framework agreement would remain in place, outlining the roles and responsibilities of the Royal Commission and the Welsh Government and outlining key governance process. It may need to be updated to acknowledge the closer working relationship with Cadw.</p> <p>The Royal Commission would continue to receive a Term of Government Remit Letter and it would be for the Commission to determine how it would deliver against the priorities included in the letter. We envisage that many of the priorities would be delivered through the joint business plan and therefore should form a key part of discussions with Cadw as part of joint business planning.</p> <p>The Royal Commission would continue to receive an annual funding letter from Welsh Government. This funding would be used to deliver the Commission's statutory responsibilities as well as the priorities outlined in the Remit Letter. This includes the elements of the joint business plan being delivered by the Royal Commission as well as a contribution towards delivering joint objectives with Cadw. It would be for the Royal Commission to determine how it allocates its funding.</p> <p>The sponsorship team would continue to meet the Royal Commission on a quarterly basis to discuss the progress being made against the priorities outlined in the Remit Letter and the objectives outlined in its operational plan. Other than reflecting in broad terms on how the Royal Commission's contribution to the joint business plan is supporting the priorities outlined in the Remit Letter and the Royal Commission's wider objectives, the quarterly sponsorship meetings would not be the forum to discuss the detail of the joint business plan with Cadw. A member of Cadw's team may attend the quarterly meetings with observer status. In turn, a member of the sponsorship team may attend joint Cadw/Royal Commission SET meetings as an observer when objectives are being set and progress is being discussed. This would help ensure consistency in understanding between the Royal Commission, Cadw and the sponsorship teams.</p> <p>We have considered other potential 'sponsorship' models and whether moving away from the Remit Letter would provide the Royal Commission with more flexibility in its partnership with Cadw. However, to ensure appropriate use of public money, this potentially would place greater emphasis on an annual grant letter with specific targets and objectives which could in turn prove to be more prescriptive and more challenging to plan ahead.</p>
<b>Staffing</b>	<p>As part of identifying areas for closer collaboration and setting the 3-to-5 year joint objectives, Cadw and Royal Commission senior leaders would need to take account of their current staffing levels and structures. Both organisations have capacity issues in meeting their current core responsibilities and would not be in a position to offer additional support to one another nor take on additional work except by transferring existing responsibilities equally in each direction. Therefore, additional members of staff may be required to ensure 'added value' from this model and to meet the objectives of putting in place in relation to Cadw and the Royal Commission:</p> <ul style="list-style-type: none"> <li>– The structure for sustainable, high-quality historic environment services for Wales</li> <li>– Agreed aims and objectives for efficient historic environment services in Wales</li> <li>– Arrangements for a sustainable workforce with specialist skills safeguarded for the future</li> </ul> <p>Additional capacity could support closer collaboration and would provide more opportunities for the sharing of resources across projects, supporting staff development in both organisations and the transfer of skills. There could be more opportunities for staff to work across the boundaries of the organisations, to provide career development opportunities, share learning and safeguard specialist skills.</p> <p>Depending on the frequency of joint Board meetings, the time commitment of Commissioners and Board members would need to be reviewed. This is likely to be the case for the Chairs as we're recommending that they meet on a regular basis to monitor progress against joint actions and review how the closer collaboration model will work.</p>
<b>Users</b>	<p>Users would continue to go to the Royal Commission and Cadw for the services they currently provide. There may be certain services that might be carried out by one organisation for both, for example public engagement work or image licensing enquiries. For 'added value' from this model, users would need to see the impact of additional joint projects and workstreams. There are staffing and cost implications for this.</p>

**Associated Costs**

Both organisations would have separate budgets to manage as appropriate. Bids by the Royal Commission for any additional grant funding to deliver projects would need to be made by both Cadw and Culture Division. The Royal Commission would continue to be able to make external grant bids on its own or in conjunction with other bodies.

In addition to the current budgets for Cadw and the Royal Commission, we envisage additional funding may be required to ensure that the closer collaboration model is able to deliver more for both organisations, and the historic environment sector in Wales, than keeping the current arrangements.

SWOT analysis of how the Royal Commission and Cadw could deliver sustainable, high-quality historic environment services for Wales by working in formal collaboration.

**Strengths**

- The National Monuments Record to remain outside of government control.
- The independence of the Royal Commission’s IT systems outside the GSI network provides the flexibility to develop and deploy the range of IT systems and services specific to the Royal Commission’s functions.
- Many users would be happy if the Royal Commission was to remain independent, although concerns about its ability to deliver would remain.
- The Royal Commission is seen as an independent voice that can advocate for the historic environment.

**Opportunities**

- A collaborative approach can lead to more streamlined and effective service (this might however come with an additional cost).
- Collaboration could be reconsidered or expanded to include additional services or partnerships, including other members of the Historic Wales Strategic Partnership at some point in the future.
- Opportunities for shared training programs for staff and volunteers, leveraging the strengths and expertise of both organisations.
- Joint initiatives can foster greater public engagement and awareness, leveraging the strengths of both organisations in education, events, and publications.
- Opportunities for collaborations with academic and heritage sector bodies in Wales and internationally, enhancing the scope and impact of projects.
- The Royal Commission’s independence allows it to pursue income sources through various channels.

**Weaknesses**

- Both organisations continue to face significant financial challenges. Without additional funding, the scope for new collaborative projects would be limited. Successful implementation would require identifying capacity within senior management of both organisations.
- Increased complexity in governance and accountability structures could be burdensome and time-consuming, potentially leading to inefficiencies and tensions in decision-making and role definition.
- Monitoring by multiple entities (sponsorship team, Commissioners, Cadw Board) could lead to conflicting views on progress.

**Threats**

- Increased administrative requirements and the need for continuous monitoring might place additional strain on the Royal Commission, Cadw and the sponsorship division.
- Continual uncertainty regarding the future of the Royal Commission would continue to impact staff morale and the ability to recruit and retain specialised talent.