
**B.C. ASSOCIATION OF PROFESSIONAL
CONSULTING ARCHAEOLOGISTS**

**STANDARDS FOR CONDUCTING AN AUDIT OF ANOTHER
ARCHAEOLOGIST'S FIELDWORK**

PREAMBLE

From time to time, provincial or federal regulatory agencies (e.g., Archaeology and Registry Services Branch, Parks Canada, Department of Indian and Northern Affairs), or stakeholder groups (e.g., First Nations, environmental organizations, resource companies) may express concerns about fieldwork carried out by an archaeologist. Such concerns usually arise in the context of cultural resource management studies, and frequently involve the level of effort made by the archaeologist, or the veracity of results reported by that archaeologist.

If representatives of stakeholder or regulatory authorities do not believe that their concerns are being adequately addressed through normal communications with the archaeologist, they may choose to engage a third-party authority to conduct an audit of the original field study. It is the view of this Association that fieldwork audits must not only be conducted according to scrupulously objective and independent principles, but also that they must be perceived in the same way by the other parties in the dispute.

Because fieldwork audits have considerable potential for creating ill-will among the various participants, it is important that they only take place in situations where other means of dispute-resolution have failed to satisfy the parties. Members of this Association should not undertake audits frivolously, and the Association discourages members from becoming entangled in disputes between parties where archaeological resources are not the principle reason for the conflict.

To this end, the following policy outlines standards of practice for conducting a fieldwork audit. These measures will be followed by all members of this Association, regardless of whether the original field study was undertaken by another member. At all times, the consultant should try to adhere to the legal principle known as *amicus curiae* ("friend of the court"), and not place him- or herself in the position of obviously favouring one side or the other.

PART A: INTRODUCTION

- (1) This policy was adopted by the BCAPCA membership at the 2005 AGM in Victoria B.C. on 12 March 2005.
- (2) The intent of this policy is to develop operational standards for conducting an audit of the fieldwork completed by another archaeologist.

PART B: APPLICATION

- (1) This policy shall apply to all members of the Association.
- (2) These standards shall apply whenever a member of this Association is requested to undertake a field audit of archaeological studies conducted by other individuals that have been questioned by regulatory authorities or stakeholder groups.

PART C: DEFINITIONS

- (1) A **fieldwork audit** refers to an archaeological field investigation conducted by a consultant to review the results and/or level of effort achieved by another archaeologist. In-office reviews of another archaeologist's work do not constitute an audit as considered in this policy. Further, an archaeological impact assessment conducted on lands that were previously assessed by another archaeologist does not represent an audit of the original archaeologist's work.
 - (2) The **previous archaeologist** or **original archaeologist** refers to the individual responsible for carrying out the archaeological field investigation that is being audited by a member of the Association; this individual may or may not be a member of the Association.
 - (3) The **client** refers to the agency, individual, or institution that engaged the services of a member to conduct a fieldwork audit.
 - (4) A **stakeholder** is any individual, agency, company, Aboriginal community, or group with direct interest or involvement in the project being reviewed. This excludes officials of the provincial government or other regulatory bodies who are authorized to inspect a project being conducted under the terms of their Permits.
 - (5) The **Association** refers to the B.C. Association of Professional Consulting Archaeologists.
 - (6) **Participation** refers to implementation of the methods of the audit and might involve: (i) digging subsurface tests; (ii) screening excavated matrix and identifying cultural materials; (iii) identifying cultural features and recording their attributes; and (iv) collecting increment-cores. Participants act under the direction of the member conducting the audit, and may provide advice to the member.
 - (7) **Inspection** refers to observation and recording of information about the actions, and results of the actions, of the member conducting the audit and any participants acting under the member's direction. It may also involve independent recording of observations about archaeological resources within the study location, but should not involve any activity that would require a permit (unless authorized by an independent permit). Individuals inspecting a fieldwork audit do not act under
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the member's direction, and should not report their observations to the member, or provide any advice to the member before the audit has been completed.

PART D: POLICY

CLIENT RELATIONS

- (1) To ensure that all parties perceive a fair and balanced approach to the fieldwork audit, the terms of reference under which the audit will be conducted should, so far as possible, be defined by the consultant alone. To this end, a member who is asked to conduct an audit shall, as soon as possible thereafter, enter into a written contract with the client that includes an agreement to limit their discussion of the terms of reference to the following considerations: (i) questions that the fieldwork audit must address (the member shall retain the discretion to propose in the terms of reference, questions that he or she has not discussed with the client); (ii) the timeframe within which the audit will be completed; (iii) the cost of the audit; (iv) whether the audit will be conducted in accordance with a provincial permit; (v) whether a survey-sampling strategy will be employed (the client may specify an audit of all of the original archaeologist's work relevant to the questions proposed, or may allow sampling, but may not discuss with the member the definition of the units to be sampled, the method of sample selection, or the sample size; if sampling is adopted, the client may not stipulate that particular sampling units be selected); (vi) the level of involvement of third-party stakeholders, and; (vii) conditions limiting disclosure of the terms of reference and the audit report.
- (2) The proposed terms of reference for the fieldwork audit shall include a detailed list of all questions to be addressed, and an outline of the methods that will be employed to address them.
- (3) As far as practicable, the member should endeavour to minimize direct contact between him- or herself and the client, following an initial or start-up meeting(s).

RELATIONS WITH THE ORIGINAL ARCHAEOLOGIST

- (4) Upon accepting a contract to conduct an audit of another archaeologist's fieldwork, a member shall always notify that party that an audit is to take place, except where such disclosure contravenes an agreement for confidentiality in a legal case.
 - (5) The notification shall follow the stipulations of the Association's **Review Notification Policy**, dated 17 April 1999.
 - (6) The complete terms of reference for the fieldwork audit, except for the proposed cost, shall be included in the notification provided to the original archaeologist according to section D(5), and the original archaeologist shall be invited to
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comment on those terms of reference, at least 10 days prior to initiation of fieldwork for the audit. If the member subsequently revises the terms of reference, he or she shall advise of the original archaeologist of those revisions. Any comments on the terms of reference received from the archaeologist shall be included in the audit report.

- (7) Except as limited by confidentiality requirements, as stipulated in the Bylaws of the Association, the member shall endeavour to meet with the original archaeologist to discuss the previous fieldwork, and obtain copies of the original archaeologist's fieldnotes, field-photographs, development plans showing survey traverses and archaeological discoveries, and any other documents that may be pertinent to the project.

PERMIT REQUIREMENTS

- (8) If fieldwork for the audit is expected to demand investigation of subsurface sediments and/or other kinds of disturbance to archaeological resources, it must be conducted in accordance with a provincial Heritage Inspection Permit and any relevant archaeological research permits issued by Aboriginal communities, as stipulated in the Bylaws of the Association.
- (9) If the fieldwork audit is to be conducted in accordance with a provincial permit, the complete terms of reference for the audit, except for the proposed cost, shall be included in the permit application.

STAKEHOLDER RELATIONS

- (10) During the fieldwork for an audit, the member shall not solicit or accept any advice or information from any representative of the client, or of any other party who may be a stakeholder in the project. Further, the member should not allow such individuals to participate in any way in the execution of the audit fieldwork; this exclusion does not employees of those parties who may be required to provide specialized transportation to the location of the audit (e.g., vessel-operators, pilots).
- (11) The Code of Conduct of this Association explicitly acknowledges the special relationship between First Nations' communities and the archaeological remnants of their cultural heritage. In consideration of this, and notwithstanding Section 10 above, where First Nations' policies or protocols require that their representatives be involved in archaeological fieldwork, and an exemption to these policies cannot be negotiated, the member shall make every reasonable effort to facilitate their involvement as inspectors. . In the event that First Nations' representatives are present during a fieldwork audit, the member shall ensure that their role remains that of independent inspectors, and that they do not formally provide advice or other direct input into the audit.
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FIELDWORK STANDARDS

- (12) As far as possible, the first objective of the fieldwork audit should be to replicate the survey coverage or investigations accomplished by the original archaeologist, by following reported survey traverses, identifying subsurface tests, and relocating cultural features.
- (13) Where feasible, examination of the original archaeologist's entire survey coverage area is preferred. If the fieldwork audit will employ a sampling strategy, the audit proposal shall: (i) define the populations to be sampled and the sample units; (ii) define the sample size and outline the method of sample selection (random selection is preferred if total survey coverage will not be achieved), and; (iii) provide for presentation, in the audit report, of confidence interval estimates of any population parameters estimated from sample data.
- (14) Additional lands can be covered by the fieldwork for the audit, if a greater level of effort is desired, but under no circumstances should the audit include coverage of lands that were not part of the study area defined by the original archaeologist.
- (15) A member conducting a fieldwork audit shall endeavour to mark all identified archaeological resources, survey traverses, and subsurface tests in a manner distinct from, but consistent with those used by the original archaeologist; new markings should be dated, and the field investigator clearly identified.
- (16) The member shall not remove such markings from any archaeological resources, survey traverses, or subsurface tests identified by the original archaeologist, including those associated with spurious cultural features; new marks can be added to previously identified points.

REPORTING STANDARDS

- (17) The report describing the outcome of the fieldwork audit must include a declaration by the member that the audit was conducted in an impartial fashion, and that the client did not prepare any part of the report or edit the report before it was submitted to the client and other parties.
 - (18) The report prepared by the member should identify what documents were provided for the audit by original archaeologist, and must provide maps or plans showing the location of survey traverses and area of coverage achieved during the audit fieldwork, as well any archaeological resource found and/or relocated, and a statement of certainty about replication of the previous fieldwork.
 - (19) The report prepared by the member shall fairly review all aspects of the original archaeologist's fieldwork, both positive and negative, and shall not place undue emphasis on any particular component. The fieldwork shall also be evaluated in terms of the original archaeologists' permit application, if available.
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- (20)** Quantifiable data described in the audit report should be obviously comparable to those employed by the previous archaeologist; specific quantities shall be indicated and their effect on the assessment of the original fieldwork must be explicitly stated.
 - (21)** Except as limited by confidentiality agreements, as stipulated in the Bylaws of the Association, copies of the audit report shall be distributed to the following parties: (i) the client, (ii) the original archaeologist, and (iii) appropriate regulatory authorities, including First Nations where required as a condition of their communities' heritage research permits and policies.
 - (22)** The member shall employ all reasonable measures to ensure that the audit report is received simultaneously by all of the parties listed above.
 - (23)** A copy of the audit report shall be kept on file by the member and shall be made available to the Association upon request, except as limited by confidentiality agreements, as stipulated in the Bylaws.
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