

# On the Classification of the Cultural Heritage Sector within NACE

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**Abstract:** - This paper reports on the findings and recommendations of the European Confederation of Conservator-Restorers Organisations' (hereafter E.C.C.O. [1]) investigations into the inclusion of Conservation-Restoration in the NACE Codes [2]. It is observed that the classificatory hierarchy employed in the NACE Codes is not utilised fully with respect to the sector, leading to the exclusion of relevant specialisms, such as Conservation-Restoration, from the data. Whereas this is easily resolved; and with minimal adjustment to the codes; the definition of heritage implicit in the Codes does not reflect current theory or practice. It is suggested that the relevant Division in the NACE Codes be renamed "Cultural Heritage Activities". The paper finishes by considering how cultural heritage might be developed as a discrete sector, where the activity of Conservation-Restoration is situated alongside all other heritage related activities.

**Keywords:** - Conservation-Restoration; NACE; ISCO; Cultural Heritage; ESSnet-Culture; Voices of Culture; heritage professions

## 1 Introduction

The community of Conservator-Restorers across Europe has long been aware that no tax code specific to the activity of Conservation-Restoration is assigned within NACE [3]. Likewise, the occupation of the Conservator-Restorer has no corresponding code in the International Standard Classification of Occupations (ISCO) [4][5]. This lack of designation means that no statistical data on the economic profile of Conservation-Restoration can be obtained, the contribution the activity makes to the economy of Europe remains hidden, and the profession is not accorded the same standing as other professions listed in ISCO.

There are many reasons, historical and structural, for this anomaly. The 'emergence' of Conservation-Restoration as a specific activity, distinguishable from 'restoration' as currently defined in NACE, is a contributory factor. So too is the methodology by which the economic data is compiled and structured with respect to cultural activities, making it even more difficult to situate the activity of Conservation-Restoration. That Conservation-Restoration straddles both the sciences and the humanities is a further complicating factor.

In 2014, an E.C.C.O. Working Group began re-examining the structure of the NACE Codes, and the recommendations contained in *ESSnet-Culture Report*, the Final Report of the European Statistical System Network on Culture (2012) [6]. The *ESSnet-Report* is a review of current methodologies and frameworks for gathering and organising statistical data on cultural activities at European level. Initiated, conducted, and published by Eurostat, the review was undertaken by experts from the National Ministries for Culture and National Cultural Institutions, in accordance with the "Open Method of Coordination" (OMC [7]). From its analyses, the E.C.C.O. Working Group brought forward the recommendation that the activity of Conservation-Restoration should be added to the existing structure of NACE.

There is, however, more to the addition of Conservation-Restoration to the Codes than the mere technical matter of amending the classification: the Codes do not reflect contemporary heritage theory or practice, namely they do not accord with the fact that culture, heritage and associated activities are now recognised as social and economic forces in their own right, nor acknowledge the broad range of actors with full core sectoral

competences *and* transversal skills that are cross sectoral [8].

Acknowledging this paradigm shift—which finds expression in the Council of Europe’s Framework Convention on the Value of Cultural Heritage for Society (CoE, Faro, 2005 [9]), E.C.C.O. issued a statement from its 2016 Presidents’ Meeting stating that the activity of Conservation-Restoration is a resource for society [10]. This statement anticipated the establishment of an expert group within the EU Framework of the Work Plan for Culture (2017-2018; see below) to examine, through the Voices of Culture Dialogue, traditional and emerging professions in cultural heritage, with a focus on skills, training and knowledge transfer.

Thus, in May 2016, the European Commission DG Culture and Education initiated a suite of seven parallel, thematic, structured dialogues under the banner Voices of Culture (VoC). E.C.C.O. participated in the Structured Dialogue on “Skills, training and knowledge transfer for traditional and emerging heritage professions” [11]. The Dialogues were completed and published in October 2017 [12]. The deliberations of the Dialogue on “Skills, training and knowledge transfer for traditional and emerging heritage professions” were firmly situated within the prevailing view across Europe that the diverse activities and professions that make up today’s cultural heritage sector are social and economic forces in their own right. E.C.C.O. entered the VOC Dialogue from precisely this stand-point, and with the Working Group’s in-depth, critical knowledge of NACE, ISCO, and the *ESSnet –Culture Report*.

## 2 How NACE Works

NACE applies a four-tier, hierarchical classification to twenty-one sectors (A to U) of the European economy, codified alpha-numerically (viz. the NACE Codes). Activities in each of the sectors are categorized into a three-tier, linear progression of increasing specificity, namely Divisions, Groups and Classes. The sector of interest here is R: Arts, Entertainment and Recreation. Four activity divisions are recognised within this sector: R90 Creative, Arts and Entertainment activities; R91 Libraries, Archives, Museums and other Cultural activities; R92 Gambling and Betting;

R93 Sports activities and Amusement and Recreation activities.

In the case of Division R91—the field of specific relevance to this study— no progressional distinction or refinement is applied between Division and Group (see Table 1). This means that, in reality, Division R91 is operating with two, instead of three, orders. In effect, the classification jumps straight from Division to Class, at which level just four Classes of activities are distinguished: 91.01 Library and Archives; 91.02 Museums; 91.03 Operation of Historical Sites and Buildings and similar visitor attractions; 91.04 Botanical and Zoological Gardens and Nature Reserves. This foreshortening of the hierarchy impacts directly on the level of detail that is captured by NACE. In its current format, specialist activities, such as conservation-restoration, archaeology, genealogy, history, architectural history, and so on, are not identified in the NACE Codes.

The NACE Codes are used at national level for purposes of taxation, and nationally and internationally by organisations such as Eurostat, to generate statistical data on sectoral and sub-sectoral economic activity, performance and contribution. The absence of specialist activities at the level of Class means that the contribution to economic activity made by these and other specialisms in the cultural heritage sector is invisible statistically, and, as a consequence, possibly in other ways too. In fact, as recognised in the *ESSnet-Culture Report*, the NACE Codes operate on a narrow and limited projection of the cultural field. Apart from one reference to ‘world heritage sites’, the terms ‘heritage’ and ‘cultural heritage’ are not used, despite the fact that the term ‘heritage profession’ is commonplace, and many actors in this field describe themselves, and are employed as ‘heritage professionals’ or ‘heritage specialists’.

Finally, it is important also to note that occupations corresponding to each activity area in NACE are registered on the International Standard Classification of Occupations (ISCO). Consequently, as outlined below, achieving recognition of specialist actors in the field of heritage in the NACE Codes is, if not predicated on then at least linked to achieving recognition on ISCO [13]. Within ISCO, the legal, social and cultural professions form a group requiring tertiary education, whose qualifications are calibrated to the European

Qualifications Framework (EQF) The group.  
 Conservator-Restorer would fall into this

Table 1. 91 Division – Libraries, Archives, Museums and other cultural and natural heritage activities (NACE)

Division	Group	Class
91 Library, Archives, Museums and other cultural activities	91.0 Library, Archives, museums and other cultural activities	91.01 Library and Archives activities
		91.02 Museums activities
		91.03 Operation of historical sites and buildings and similar visitor attractions
		91.04 Botanical and zoological gardens and nature reserves activities

### 3 Inserting Cultural Heritage activities into NACE: finding a place for Conservation-Restoration

Considering how Conservation-Restoration activities might be included in the NACE classification, the E.C.C.O. Working Group projected what Division R91 might look like (Table 2) were it to be simply renamed ‘*Cultural Heritage Activities*’, and if Libraries, Archives, Museums and

other cultural activities were re-classified to Group level (rather than Class level as is currently the case) where they would be coded 91.01, 91.02, 91.03 and 91.04 respectively. Such would open the scheme to the addition of a more representative list of activities in the sector (such as Conservation-Restoration; coded 91.05 on Table 2), and reflect more fully the range of activities both at play and emerging in this field. Table 2 attempts to populate the schema for illustrative purposes only.

Table 2: Revised 91 Cultural Heritage activities

Group	Class
91.01 Archives and Libraries	<ul style="list-style-type: none"> <li>• Library and Archives activities/Archiving</li> <li>• Library and Archives Administrative management</li> </ul>
91.02 Museums Private collections Activities	<ul style="list-style-type: none"> <li>• Museums and Private Collections Activities</li> <li>• Curation of Museums and Private Collections</li> <li>• Exhibition design and construction</li> <li>• Museum education</li> <li>• Collections management</li> <li>• Handling and transportation activities</li> <li>• Administrative management</li> <li>• Invigilation</li> </ul>
91.03 Built Heritage – Monuments, churches/religious and historic interiors	<ul style="list-style-type: none"> <li>• Operation of historical sites and buildings and similar heritage attractions</li> <li>• Heritage Buildings management</li> <li>• Heritage architectural consulting activities</li> <li>• Heritage engineering</li> <li>• Heritage guiding</li> <li>• Heritage promotion</li> <li>• Heritage officer</li> </ul>

91.04	Historical and archaeological sites and historic landscapes	<ul style="list-style-type: none"> <li>• Archaeological excavation and survey / Archaeological activities</li> <li>• Heritage site management</li> </ul>
91.05	Conservation-Restoration activities	<ul style="list-style-type: none"> <li>• Heritage Preservation activities</li> <li>• Conservation-Restoration</li> <li>• Preventive conservation</li> <li>• Conservation management</li> <li>• Conservation-Restoration Technical support</li> <li>• Conservation Science</li> <li>• Conservation Research</li> </ul>
91.06	Craft activities towards restoration	<ul style="list-style-type: none"> <li>• Application of traditional techniques of production/ creation to the restoration of cultural heritage material</li> <li>• Heritage reconstruction/ renovation using traditional techniques and new materials</li> </ul>

The inclusion of a Group title “craft activities towards restoration” (code 91.06) acknowledges the existence of craft-based activities that operate in the arena of cultural heritage. These represent recognized craft-based skills, often associated with distinct training and apprenticeships, that can work specifically within the field of cultural heritage. Due to their heritage-specific nature, it is proposed here that they might be assembled in a group distinct from but sharing the same Divisional rubric as Conservation-Restoration. Conservation-Restoration is not a creative or an artistic process but it does utilise the specialist skills, knowledge and experience of many arts and crafts to achieve an ethically-based result. These are required in order to meet the demands of preservation predicated on a complex intersection of paradigmatic principles enshrined in international conventions and agreements. A canon of related, peer-reviewed literature has developed which the discipline of the Conservator-Restorer has itself spearheaded.

#### 4 Reflections on Conservation-Restoration and the NACE Codes

Amongst the many recommendations the *ESSnet-Culture Report* makes concerning culture is the suggestion that, in order to accurately identify an activity and its allied occupation, the coordinates for the respective Codes in the classification systems employed by NACE and by ISCO must be more closely correlated. This means that more detailed correspondence of the statistical data within the sector needs to be achieved — where

employment data is required it is imperative that the activities classified by NACE correspond more closely with the occupations classified by ISCO.

However, even with the addition of new Groups and Classes, the proposed restructuring of Division R91 still speaks to an out-dated perception of what constitutes cultural heritage, and where heritage is seen to reside. It does not account for the greatly expanded concept of cultural heritage as a values-driven public resource, employing diverse actors and mediators with longitudinal as well as transversal skills sets [14]. If this broadened field of cultural heritage is to be reflected in economic data and public policy, it has become apparent that the activities and occupations that make up this sector need to be carefully identified and mapped, a view that emerged from the Voices of Culture Dialogue on Skills, training and knowledge transfer and emerging Heritage professions.

During the initial phase of the E.C.C.O. Working Group there was much discussion about whether Conservation-Restoration was an activity that might be better located within the Scientific and Technical sector (M) of the NACE Codes. Needless to say, there was an initial resistance to being placed in Arts, Entertainment and Recreation given the scientific methodologies that are employed in Conservation-Restoration, but also because of a concern that this is where the activity of Restoration is already identified, and allied to Arts and Crafts: traditionally, Restoration and Arts and Crafts are grouped together. The *ESSnet-Culture Report* proposes a new cultural domain ‘Art crafts’, specifying that “[The] **creation** function is the main function of art crafts and the whole organization of art crafts originate [*sic*] from creation” [15]. This characterisation of

Restoration speaks more directly to the skills of the craftsman, raising the possibility of confusion not only in professional identity but particularly so in respect of the very processes that distinguish Conservation-Restoration from Restoration. Conservation-Restoration is not an activity that creates, replaces or reproduces but rather intervenes to understand, preserve and transmit an authentic material heritage. Restoration, in its broadest sense, may encompass the former actions (create, replace etc.) but only as they are subject to sustaining the cultural legibility or agency of the material heritage which Conservation seeks to preserve.

The rationale that ultimately prevailed in favour of retaining Conservation-Restoration within the Arts, Entertainment and Recreation Sector was that it (1) involved minimal change to the structure of the Codes; (2) recognised that the negotiation of values within Conservation-Restoration belongs in the cultural realm; and (3) that the craftsmen's skills are legitimately situated within Restoration activities already located in this Section.

## 5 Voices of Culture on Skills for Cultural Heritage Professions

During the work of the Voices of Culture Dialogue on 'Skills, training and knowledge transfer and emerging Heritage professions' it was hoped to identify emerging professions in the field of culture and heritage. The need to identify the skills and knowledge in emerging *and* traditional cultural heritage professions makes sense in the context of a broadened concept of cultural heritage, which includes the ways society authors, engages with, and participates in cultural heritage [16]. Similarly, in respect of the NACE Codes, it is also pertinent to talk about 'emerging professions' given, as we have seen, the current, narrow perspective it has on activities in this sector, and as experienced by the Conservator-Restorer.

E.C.C.O. brought to the Voices of Culture Dialogue the suggestion that the skills required of specialist professions, regardless of whether they operate in the private or public sphere, or are considered traditional or emerging, should be differentiated according to the *mission* and the purpose of their role, i.e. the reasons *why* a profession exists. *Missions*

are circumscribed by a set of actions that are informed by specific competences, skills and knowledge [17]. These apply to all professions in the field, and in turn are related to qualifications regarding professional identity and recognition. The need to transmit an authentic cultural heritage has witnessed the 'emergence' of, inter alia, the profession of the Conservator-Restorer, which, accordingly, can be seen as a discrete demographic of professionals with a specific *mission*, based on a comprehensive set of competences that has been mapped by E.C.C.O. [18]. This position is reflected in the report issuing from the Voices of Culture Dialogue on Skills. E.C.C.O. also proposed that a link could be made between the *missions* identified in VOC and what the *ESSnet-Culture* framework defines as '*Functions*' (see below).

## 6 Connecting the Voices of Culture Dialogue to ESSnet-Culture and NACE

The '*missions*' rubric proposed in the Voices of Culture Report aligns with the '*Functions*' system employed in the *ESSnet-Culture Report* on NACE. Considering the influence that the latter might exert on future revisions of this aspect of the NACE framework, E.C.C.O. developed a matching proposal that situates Conservation-Restoration within a reconfigured statistical framework based, this time, on our interpretation of the framework introduced in the *ESSnet-Culture Report*.

## 7 ESSnet-Culture Report: Domains, Functions and Actors

As we have seen, the ESSnet-Culture Working Group undertook a review of the existing framework used for the generation of statistical data in the field of culture. The framework in question is based on a model developed by UNESCO in 1986, and a later Eurostat pilot project "Harmonisation of Cultural Statistics in the EU"; commonly known as LEG-Culture, 1997-2002; where the terminology of *Cultural Domains* and *Functions*, adopted by ESSnet, is employed [19][20]. ESSnet describes a *Cultural Domain* (ten of which are identified; two more than LEG-Culture but seven less than the classification proposed in UNESCO's 2009

*Framework for Cultural Statistics (fcs)* as ‘a set of practices, activities, or cultural products centred around a group of expressions recognised as artistic ones’ [21][22]. *Functions*, on the other hand, are categories or sets of actions carried out by actors within the *Cultural Domains* (e.g. creation; production/publishing; dissemination; preservation; education; management/regulation). The broadly sequential order of the list of six *Functions* (one more than LEG-Culture) deliberately emphasises how they juxtapose with and relate to one another in the activities associated with culture. The *Report* insists that, irrespective of how they are ordered/sequenced, at the heart of the *Functions* is the act of creation: creation, according to ESSnet-Culture underpins all cultural activity, even the domain of heritage.

ESSnet defines professionals (hereafter actors) as persons who exercise their occupation „in economic units of the cultural sectors“; elsewhere in the *Report* as persons operating „in the creative and artistic economic cycle, i.e. creation, production/publishing; dissemination/trade, preservation; education; management/regulation” [23]. Conceding that the complexity and diversity of skills, tasks and locations-of-practice makes it very difficult to classify cultural occupations, the *Report* leans on but remains critical of the International Standard Classification of Occupations-08 (ISCO-08), where relevant cultural occupations are distributed across the Classification (i.e. they are not gathered together), and even at the finest grain (i.e. at the fourth level of the digital code) are probably still too aggregated with others. The 120 occupations surveyed in the *Essnet-Culture Final Report* are harvested, applying bespoke criteria, from a combination of ISCO-08 and NACE-Rev.2 codes [24]. They are not named *per se* in the *Essnet-Culture Report*, but are instead listed with reference to their 3- and 4-digit ISCO-08 and NACE Codes, with a declared preference for the 4-digit identifiers.

## 8 Who are the Actors in cultural heritage?

A model produced in the *Essnet-Culture Report*, identifies three types of professions/actors that operate within the cultural sector [25]. For the purposes of this

examination of the cultural heritage sector, two of these categories of actors are specifically relevant, i.e. actors employed in a cultural occupation in the cultural sector, e.g. a musician in an orchestra, and actors employed in a non-cultural occupation in the cultural sector, e.g. a theatre administrator.

Applying this model to the cultural heritage sector distinguishes two types of actor:

- actors whose occupation is intrinsically linked to cultural heritage—they could not exist in any other sector
- actors whose occupation is not intrinsically linked to cultural heritage but who work within the sector. Similar actors can be found in other sectors (e.g. managers and administrators).

## 9 Why are these categories important?

Applying these two categories of actor to cultural heritage shows that comparable relationships exist between actors operating in the cultural heritage sector: there are actors whose occupation exists specific only to cultural heritage, and others who have transversal skills that can be applied in the field of cultural heritage.

Similarly, the six *Functions* performed by actors in the cultural sector framework advanced by ESSnet-Culture also apply in cultural heritage, demonstrating that cultural heritage can be regarded as a sectoral entity in and of itself. This observation contributes to the already compelling argument that cultural heritage should be recognised as a sector in its own right in NACE. Such would allow the requisite education and training to be resourced, enabling the delivery of the appropriate skills, knowledge and competences. In other words, for these various actors to fulfil their *missions* in the field of cultural heritage, they require skillsets, competences and knowledge, i.e. education. In a sector called ‘Cultural Heritage’, the *mission* of these Actors is to serve cultural heritage, whether applying core skills that fit into the first category, or transversal skills that fit into the second. Of critical importance, however, is the fact that some professions are based on a discrete deontology, or code of ethics, because their *mission* may directly impact on cultural heritage.

## 10 Developing the ESSnet framework

As we have seen, the statistical framework proposed by ESSnet, classifies Cultural Activities into 10 *Cultural Domains*, of which Heritage is one —here comprising the now familiar territory of Museums, Historical Places, Archaeological Sites and Intangible Heritage. (Note: Libraries and Archives have each been assigned their own unique *Cultural Domain*, accounting for a further 2 out of the 10 *Cultural Domains*.) Heritage *per se*, however, is not to be equated with, nor does it reside in, cultural institutions, fixed assets, collections held in designated places, or indeed monuments [26]. Heritage *per se* is an *outcome* of diverse social activities, interactions and encounters occurring across all remaining nine *Cultural Domains*, and others besides. To be sure, museum collections, historical and archaeological sites, archives, and so on, are heritage assets but they become heritage *per se* when, in the negotiation of societal values, they are conferred with cultural *agency*. A useful analogy is the storage of money in a bank vault: the value and agency of money are only realised in socio-economic transactions. Like old bank notes and coins, heritage assets rarely if ever retain anything of their original cultural value or agency. Rather, the meaning and agency of heritage assets changes because they are refracted and/or negotiated through complex contemporary cultural lenses and value systems. Heritage assets can be touchstones of historical cultural memory; though in many cases they are far older than the reach of cultural memory; but the keys that are used to unlock them are forged by contemporary society.

In such circumstances, how are the authentic values associated with heritage assets, now and into the future, safeguarded against social whimsy, or populist or malign manipulation? By acknowledging the existence of the full range of heritage resources *and*, in particular, the specialised field of heritage practice which includes the study, interpretation, conservation, performance, mediation, dissemination, management, stewardship and valorisation of those heritages. Compartmentalising heritage as a discrete Cultural Domain distorts the transversal nature of heritage itself, and, so doing, also disavows the role of multiple Actors, including the

public, in giving cultural heritage its agency, as set out in inter alia the Faro Convention, the Voices of Culture on Skills work, the corpus of international peer-reviewed studies. As witnessed by the Faro Convention and the Voices of Culture dialogues, contemporary heritage theory and corroborative case-studies describe and attest to a perspective, and tried and tested methodologies, that amplify and grow the public good that is cultural heritage.

Considering the *nature* of heritage, and given that heritage practice is understood as a *Function/action* that applies across all 10 Domains; and actually, far beyond the Culture Sector as it is defined; cultural heritage should be accorded sectoral status.

## Conclusion

The thesis outlined above demonstrates that cultural heritage should be developed as a discrete economic sector in the NACE Codes, using the concepts of *missions* as they describe *Functions*, and taking into account the phenomenological characteristics of heritage *per se*. The activities identified in NACE automatically reflect occupations found in ISCO. By corollary, occupations are described by their competences, which translate into discrete sets of knowledge, skills and competences as currently identified by the European Qualifications Framework in respect of each profession.

Although Eurostat has improved the collection of statistics on cultural activities by broadening its methods of data collection, such as the EU Labour Force Survey [27], the problem of identifying activities in cultural heritage remains. Since 2016, for statistical purposes only, some activities have been considered as cultural activities although located outside Sector R: Arts, Entertainment and Recreation. This reflects a statistical attempt to account for real-world activities, and has helped to collect some data. However, the same protocol has not been, and cannot be, used for heritage activities because the data does not distinguish cultural activities from heritage-related activities. Overall, statistics on cultural employment are obtained based on the cross-tabulation of various data, estimated figures from data provided by subscribing countries, and the compilation of several methods of data collection. There is no comprehensive classification methodology for

the collection of data on heritage employment, and consequently such statistics still remain hidden [28].

The proposal contained in this paper is the best solution that can be developed while working within current structures. It allows the sector to be assessed, and changes to be made in keeping with the work that has been carried out to date, including the blueprint arising from the work of the Voices of Culture Dialogue on Skills which speaks to concerns raised in the *ESSnet-Culture Report*.

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- [23] *Essnet-Culture Report*, pp. 55-6; 143ff.
- [24] Essnet-Culture defines cultural occupations to include “occupations involved in the creative and artistic economic cycle i.e. creation, production, dissemination and trade, preservation, education, management and regulation, as well as heritage collection and preservation.”, and surveyed 120 occupations identified by 3 criteria: (a) for the purpose of artistic expression (e.g. visual arts, performing arts, audiovisual arts etc.); (b) to generate, develop, preserve, reflect cultural meaning; (c) to create, produce or disseminate cultural goods and services, generally protected by copyright”. *Essnet-Culture Final Report*, p. 144.
- [25] Persons employed in a cultural occupation in the cultural sector (e.g. a musician of an orchestra); persons employed in a cultural occupation in the non-cultural sector (e.g. a designer in the automobile industry); persons employed in a non-cultural occupation in the cultural sector (e.g. a secretary in the administrative office of a theatre).
- [26] The fact that every Sector and *Domain*, whether or not is it classified as *cultural*, generates its own heritage(s), attests to the intangible, relational nature of heritage *per se*.
- [27] <https://ec.europa.eu/eurostat/web/micro-data/european-union-labour-force-survey>
- [28] Eurostat, *Guide to Eurostat culture statistics*. Publications Office of the European Union, 2018  
<https://ec.europa.eu/eurostat/web/products-manuals-and-guidelines/-/KS-GQ-18-011>