

Victorian Aboriginal Heritage Register

Place Inspection Forms - a Guide

What is a Place Inspection Form?

The purpose of the Place Inspection Form (PIF) is to provide a consistent record of all inspections of a registered Aboriginal place or object. The PIF is used to record changes in condition, and to identify current impacts and potential threats to an Aboriginal place or object.

A PIF may be used to:

- Report the results of an inspection and/or further investigation into the extent or nature of a registered Aboriginal place or object as part of the assessment for a Cultural Heritage Management Plan (CHMP) or an application for a Cultural Heritage Permit (CHP).
- Resolve or complete incorrect, inaccurate, inconsistent or incomplete details about a registered Aboriginal place or object; particularly its location, extent, nature or preservation.

PIF documentation forms part of the registration of the Aboriginal cultural heritage. For the purposes of s.67(3) of the *Aboriginal Heritage Act 2006* (the Act) regarding submission of assessment documentation, the registration is the tab-based Aboriginal Cultural Heritage Register Information System (ACHRIS) record.¹The registration should show a complete and current, cumulative understanding and interpretation of the place's location, extent and nature.

When is a PIF required?

All heritage professionals are encouraged to submit a PIF after re-visiting a registered Aboriginal place. However, a PIF may be required to comply with Schedule 2 cl.11(1) of the Aboriginal Heritage Regulations 2007. Schedule 2 stipulates that descriptions of any Aboriginal cultural heritage found in an activity area that is the subject of a CHMP must be consistent with the registration of that Aboriginal cultural heritage on the Victorian Aboriginal Heritage Register (VAHR).

Where there is an existing Aboriginal place registration in an activity area for a CHMP, it is a requirement that a PIF is completed as part of the CHMP process to make any necessary alterations to the registration.

A PIF is **not** required as part of a CHMP process in the case where the registration is complete and there is no further information available about the place that is to be reported in the CHMP.

Salvage and reporting

A PIF should be completed as part of any salvage of an Aboriginal place or object. In addition, the discovery of further Aboriginal cultural heritage during a salvage must be reported to the VAHR, in accordance with the *Standards for Recording Victorian Aboriginal Heritage Places and Objects*, and any subsequently issued guidelines, available on the Aboriginal Victoria website (see below).

¹ "Registration" means the same as Schedule 2 cl.11(1) of the Aboriginal Heritage Regulations 2007. It is also referred to as "entry in the Register" in s.144(2) of the Act and "alterations to the record" in the 3 September 2017 Open Letter to Heritage Advisors on *timely submission of Place inspection forms to the Victorian Aboriginal Heritage Register*.

When should a PIF be submitted?

All PIFs should be submitted at the same time as any submissions to register new Aboriginal places; and well in advance of any CHMP submission. A CHMP should only be submitted for approval once confirmation of the verification of the PIFs has been received from the Heritage Registrar.

Approaches to Place Inspection and completing PIFs

Relocating the Aboriginal place

The aim of a Place Inspection is to re-locate the registered Aboriginal place or object. It is important to consider the full extent of the Aboriginal place, including parts outside the activity area; not just the primary grid coordinate (PGC) provided in ACHRIS, nor the coordinates from the original site card that may have been recorded prior to the current GDA94 datum.

TIP 1:

Information presented in a PIF must consider the Aboriginal place as a whole, not only that part seen at the time of the inspection, its PGC on ACHRIS, or the PGC as recorded on the original site card. It is essential to refer to all documentation about a place, including associated reports.

It is expected that heritage advisors attempt to locate and re-record the PGC of an Aboriginal place if the original recording method was not sub-metre accurate.

Establishing the extent of a registered Aboriginal place

The extent must reflect the maximum recorded extent of the Aboriginal place, regardless of any subsequent impacts. It is important when completing a PIF that the Aboriginal place extent description outlines the methodology used for establishing the extent. It should also include source/s used and any assumptions made when correcting errors or inconsistencies in the registration or collating information to complete the registration (e.g. the report/s and maps used). The PIF extent plan may mark areas within the revised/expanded place extent where additional Aboriginal cultural heritage has been identified.

TIP 2:

Many of the older records on ACHRIS are represented only by their PGCs. It is also common for these coordinates to be inaccurate owing to their age and changes in technology. It is essential that these coordinates are compared to maps and plans as well as descriptions to determine a place's location and extent. As part of a PIF, new maps and spatial data must be produced to complete the registration.

What if the registered Aboriginal place is in the wrong location?

If it is established that the Aboriginal place, currently registered inside the activity area, is actually outside it and cannot be re-recorded as part of the CHMP, a PIF must still be provided to correct the location by proposing a reasonable alternative using available information.

Bear in mind that the opposite scenario is also possible: an Aboriginal place currently registered outside the activity area may, upon inspection, actually be inside it, whether wholly or in part.

If it is established that the registered PGC and/or extent of the Aboriginal place is incorrect and a reasonable alternative cannot be proposed, documentation of the methods and sources used to try to re-locate the place must still be provided. Reasoning as to why these methods were not successful is also expected. A status of non-site may then be proposed, which effectively de-registers the Aboriginal place but allows for the possibility that it may be re-located in future and the registration re-enabled.

Approaches to Place Inspection and completing PIFs (cont.)

Does damage affect heritage significance?

It is rare for a registered Aboriginal place or object to be de-registered. This generally only occurs where there is convincing evidence, documented using a PIF, that the nature of the place has incorrectly been identified as Aboriginal cultural heritage.

In accordance with section 8 of the *Aboriginal Heritage Act 2006*, Aboriginal cultural heritage does not cease to be Aboriginal cultural heritage if it is damaged or modified. An Aboriginal place on the VAHR is not 'de-registered', nor is its extent reduced, if all or part of the place cannot be found because it has previously been salvaged, damaged, or destroyed, or is now obscured. Rather, these are examples of condition changes and must be recorded using a PIF (e.g. the PIF extent plan may mark areas within the Aboriginal place extent that have since been destroyed). However, it may be considered that subsequent activities would not further impact the physical components of the Aboriginal place.

TIP 3:

Aboriginal cultural heritage does not cease to be Aboriginal cultural heritage if it is damaged or modified. Therefore, the registered extent of an Aboriginal place is not reduced owing to damage or modification. It is also not 'de-registered' if it has been destroyed or cannot be found at a later date.

Where do I find the form and how do I complete it?

The Approved Form for a PIF is interactive and contains instructions on how to complete it. The form is available on the Aboriginal Victoria website at

https://www.vic.gov.au/system/user_files/Documents/av/Place_Inspection_Form_Interactive.pdf

All PIFs should be completed in accordance with the *Standards for Recording Victorian Aboriginal Heritage Places and Objects*, and any subsequently issued guidelines, available on the Aboriginal Victoria 'Guides, forms and practice notes for Aboriginal heritage management' web page at

<https://www.vic.gov.au/aboriginalvictoria/heritage/heritage-tools-and-publications/guides-forms-and-practice-notes-for-aboriginal-heritage-management.html>

How do I send the PIF to Registry?

Email the completed form, and all attachments, to VAHR@dpc.vic.gov.au .

PIF completion checklist

To enable quick and easy submission, processing, and verification of PIFs resulting from CHMPs and salvage, use the checklist provided.

Aboriginal Places other than LDADs

All PIFs must be submitted with **location, context and extent plans** for the Aboriginal place. Spatial data must also be supplied. The mapped extent and data must reflect the **largest known extent** of the Aboriginal place.

Maps/plans and spatial data for Aboriginal places within a CHMP activity area must meet Aboriginal Victoria's *Standards for Recording Victorian Aboriginal Heritage Places and Objects* and any subsequently issued guidelines.

If the Aboriginal place was unable to be re-located in the field:

- The PIF must state that the place was unable to be re-located and the reason suspected for this. A description must be supplied about the methods used to relocate the place and the sources that may have been referred to. The place is **not** automatically a 'non-site'.

If the Aboriginal place was re-located in the field:

- The PIF must state what was re-located and describe the current condition of the place. Maps and plans must be supplied as above but may be augmented by your field recordings if further information about the place was recorded. Re-record the PGC if the original recording method was not sub-metre accurate.

If the place was re-located for salvage and components were collected:

- A PIF must be supplied with an object collection form that contains a catalogue or table of those components that were collected. Photos of the cultural material are also required.

If the registration about the components is incomplete at the time of the inspection:

- A PIF must be supplied along with component forms if the original record is incomplete. Information should reflect the full nature of that component and where necessary be collated from multiple sources.

If components that were collected are re-buried:

- An object collection form must be supplied along with a catalogue or table of the material that was reburied.
- A map (location, context and extent) showing the location of the buried artefacts should also be provided.
- If the reburial location is within the original place extent, a PIF must accompany the object collection form.

If the current coordinates on the record are found to be incorrect:

- A PIF must be supplied with a corrected location and justification for the change. Maps and spatial data must also accompany the PIF.
- If it is not possible to provide a corrected location, justification must be given and a recommendation for non-site status may be appropriate (please contact the Registrar prior to submitting a PIF in this instance).

If the new extent of a place overlaps one or more other existing registrations or there is substantial additional information (multiple new components):

- A new Aboriginal place registration should be initiated. Do **not** submit a PIF.

Low Density Artefact Distributions (LDADs)

If no artefacts were re-located in the field:

- The PIF must state that the artefacts were unable to be re-located.

If the artefacts were re-located in the field:

- A PIF must be supplied with a table identifying the re-located artefacts (refer to the original component reference number e.g. 7922-1234-1).

If the original artefacts were re-located and collected:

- A PIF must be supplied with an object collection form that contains a catalogue or table of those artefacts that were collected (refer to the original component reference number e.g. 7922-1234-1).

If artefacts that were collected are re-buried:

- An object collection form must be supplied along with a catalogue or table of those artefacts that were reburied (refer to the original component reference number e.g. 7922-1234-1);
- A map series (location, context and extent) showing the location of the buried artefacts should also be provided.

If additional artefacts were located:

- Any additional artefacts should be recorded within a new LDAD registration, not included in the original LDAD registration;
- If densities are above the LDAD threshold when the original and new artefacts are considered as a whole, a new Artefact Scatter registration is required. Do **not** submit a PIF.