

Parramatta Female Factory and Institutions Precinct Australia

ICOMOS Preliminary Assessment Report
October 2025



Executive summary

In line with the World Heritage Committee Decision, 44 COM 11 in 2021, the Preliminary Assessment (PA) process starting from 2027 will be a “*mandatory desk-based process for all sites that may be nominated to the World Heritage List and is undertaken following a request by the relevant State(s) Party(ies)*” (*Operational Guidelines for the Implementation of the World Heritage Convention*, Paragraph 122). Until that time, it is undertaken on a voluntary basis by the States Parties that submit their Preliminary Assessment requests by 15 September of the preceding year.

The Preliminary Assessment process provides States Parties with an opportunity for enhanced dialogue with the Advisory Bodies and helps to establish the feasibility of a potential nomination based on the provided documentation and the knowledge and competencies of international experts consulted. Accordingly, the process allows for a more targeted approach and better allocation of resources by States Parties in the preparation of future nominations of properties that can demonstrate the potential to be recognised of Outstanding Universal Value (OUV) at the Preliminary Assessment stage.

This Preliminary Assessment report remains valid for five years from the time of delivery.

The potential nominated property of Parramatta Female Factory and Institutions Precinct is proposed by the State Party of Australia as follows:

Parramatta Female Factory and Institutions Precinct, located in New South Wales in Australia, consists of an ensemble of buildings erected on the east bank of the Parramatta River, which housed from the mid-19th century till recent times different institutions tasked with behavioural control and institutional care of mainly women and children. These institutions included carceral and mental health facilities in the northern part of the potential nominated property, and social and educational facilities in the southern section thereof; the buildings within the Parramatta Female Factory and Institutions Precinct being reused, remodelled, adapted or demolished, and new ones added in each phase of occupation of the place.

The potential nominated property is presented as the testimony to the change over time in the forced institutionalisation of women and children brought about by the Age of Enlightenment. It is further said to bear witness to the lived reality of these vulnerable groups within the society, who faced abuse based on moral assumptions and judgements imposed on those who lived in poverty or were considered to be outside social acceptability.

Paramatta has been proposed as a single site and a cultural landscape. It has been appraised within the global context, taking into account especially the erstwhile territory of the British Empire or regions influenced by it. Particular consideration has been given to the so-called gendered and age-related sites.

ICOMOS FINAL RECOMMENDATION

The Preliminary Assessment of Parramatta Female Factory and Institutions Precinct suggests that there is no potential for the potential nominated property to justify World Heritage criteria and become a robust nomination along the lines proposed by the State Party.

Based on the available information, ICOMOS concludes that a part of the potential nominated property – the Parramatta Girls Industrial School in the southern section of the Precinct – might reveal to be significant if the narrative is shifted to the institutionalisation of Indigenous children as part of the colonial system and its policy of assimilation. In this regard, a major reflection of the new theme would be required and a completely new focus and nomination strategy proposed. At this stage, and within the framework of this Preliminary Assessment request, ICOMOS cannot confirm whether the Parramatta Girls Industrial School could alone be considered sufficient to justify consideration for the World Heritage List under such a revised narrative.

1. The Potential Nominated Property

1.1 Basic data of the potential nominated property and Preliminary Assessment request

Tentative List

Included on 13 September 2023 under the name of Parramatta Female Factory and Institutions Precinct, on the basis of criteria (iv) and (vi).

International assistance received

No previous requests for upstream advice or international assistance apply to the potential nominated property.

Other international designations

No other international designations apply to the potential nominated property.

Exchanges between the State Party and ICOMOS during the Preliminary Assessment process

A number of useful exchanges with the State Party occurred during the Preliminary Assessment process.

Meetings:

Meetings were held online on 13 November 2024 and 14 May 2025.

Correspondence and exchange of documents:

A letter was sent to the State Party on 18 November 2024 requesting further information about the Parramatta Precinct (Female Factory, Female asylum, Roman Catholic Orphan School, Parramatta Girls Industrial School, Kamballa and Taldree, and Norma Parker site), setting, impact of these institutions, Aboriginal history, conservation, and archaeological research.

Additional information was received from the State Party on 16 December 2024.

A second letter was sent to the State Party on 17 April 2025 requesting further clarifications about Indigenous Peoples, gendered character of the potential nominated property, the evolution of institutionalisation, and additional research.

Additional information was received from the State Party on 19 May 2025.

Other consultations

Independent and ICOMOS-affiliated experts have provided desk reviews, and comments were received from the ICOMOS Rights-Based Approaches Working Group.

Specific challenges/questions identified by the State Party

The State Party indicated in the Preliminary Assessment request that it is seeking general guidance on the relevance of the potential nominated property as an outstanding example of the suggested theme, the proposed approach to the comparative analysis and potential other examples of comparators that should be considered, as well as possible thematic studies completed or planned that could be helpful.

1.2 Understanding the potential nominated property

The potential nominated property includes two historic institutional sites located next to one another, along the east bank of the Parramatta River, in New South Wales, Australia. Each site has accommodated successively different welfare and behavioural control institutions over its long history and for short periods has also housed more than one institution at a time.

The structures in the northern section of the Parramatta Female Factory and Institutions Precinct date back to 1821 when the Parramatta Female Factory was built in this place by the British colonial forces to house the convict women transported from United Kingdom to Australia for crimes they committed. Intended first as a place of work for these women, employed for spinning and weaving and assigned to work for the free settlers, it soon became also a place of punishment. From 1826 onwards, the women were segregated into three classes with different status; first class applied to new-comers and the destitute, the second to the pregnant and nursing mothers and those returned from assignment for 'improper conduct', and the third group gathered repeat offenders. At that time, the Factory also served as a hospital for all women residing in the colony requiring medical attention. While the convict transport was discontinued in 1840, the Factory continued functioning as a prison, with the emphasis on punishment rather than employment, until 1848. The Parramatta Female Factory was then reused to serve as the Convict, Lunatic and Invalid Establishment and the Parramatta Lunatic Asylum. The two institutions co-existed on the former Female Factory site until the Convict, Lunatic and Invalid Establishment was absorbed into the Parramatta Lunatic Asylum. Both institutions had male and female patients, accommodated separately within each establishment in different areas. They were free settlers and colonial born, as well as convicts. The northern site of the potential nominated property went on to have a long and varied history of occupation relating to mental health and psychiatric treatment; between the end of the 19th century and late 20th century, it was a location of a hospital for the insane, a mental hospital, and a psychiatric centre. The latter institutions were not necessarily limited to females only.

Conversion of the ensemble of buildings from one facility to another involved substantial adaptations of the place through both demolishing of older structures and development of new ones. As a result, from the original buildings of the Female Factory, there are only three left today; they have been modified. None of the former Female Factory buildings that used to accommodate the female inmates of the Convict, Lunatic and Invalid Establishment and the Female Asylum of the Parramatta Lunatic Asylum survived as standing structures. Moreover, the spatial qualities of former yards have been altered through modification of spaces. Removal of the surrounding building stock in addition to the pulling down of the walls of the Female Factory, in line with the views on the role of landscape in rehabilitating mental health, greatly altered the feeling and experience of the place, with the initial sense of enclosure largely lost. It should also be noted that the site extended further north, with other historic institutions being located north and north east of the initial Parramatta Female Factory. These extensions are not included in the potential nominated property.

The southern part of the Parramatta Female Factory and Institutions Precinct has an equally long history that extends from 1844 to as recently as 2008. It was dedicated mostly to the institutionalisation of children. The southern site has developed from the initial Roman Catholic Orphan School for destitute children. It housed both girls and boys, lodged separately, who were orphans or were forcibly removed from Female Factory convicts, or whose parents were too poor to take care of them. There is no documentary evidence of Aboriginal children in the Roman Catholic Orphan School; they appear in the records of later institutions in the Precinct. The initial complex was surrounded by a stone wall constructed up against the enclosure wall of the adjoining Parramatta Female Factory but later on that wall was demolished. From 1887, the complex housed an Industrial School for Girls (initially named Industrial School for Females, Parramatta) that served as a female-only reformatory and training school until 1974. Intended as a welfare institution for neglected children, it included girls who had committed crimes. For the non-Aboriginal girls to be institutionalised, they had to be charged by the Children's Court with being 'uncontrollable', 'neglected' or 'exposed to moral danger' under the *Child Welfare Act 1939*. The Aboriginal children were forcibly removed from their families, communities and

culture by the government, solely due to their race/Aboriginality, in line with *The Aborigines Protection Act 1909* (and amendments). These Aboriginal children, referred to today as the Stolen Generations, were to be assimilated into the non-Indigenous populations through the institutions. At the Parramatta Girls Industrial School, Aboriginal girls faced the same sexual, physical and psychological violence as non-Aboriginal girls but were made also to feel ashamed of their cultural background, the aim being to assimilate Aboriginal people into the white population. After the Industrial School for Girls was closed, a shelter for girls with behavioural problems was opened on the site (Kamballa), together with correctional and periodic detention centres for boys (Taldree), and for women (Norma Parker).

The southern part of the Precinct has undergone less changes to its built environment, with the majority of the original Orphan School structures remaining, and few substantive modifications. A small number of subsequent buildings were added to this section of the site in later decades.

The landscape setting of the Precinct has undergone quite radical changes since the establishment of the first institutions. In general, the river and the vegetation around the site played an important role in the philosophy behind institutionalisation – for instance, the connection of inmates to nature was intentionally maintained in the treatment of patients of mental institutions in the 19th century. The open landscape setting was also at some point chosen as a relevant context for the development of the Roman Catholic Orphan School. However, later modifications changed this setup; a perimeter wall was constructed around the Parramatta Girls' Industrial School which separated the buildings from the riverfront, signalling the need to 'contain' the girls brought into the institution. Additional modifications throughout the 20th century have further detracted the structures within the Precinct from the landscape. Today, the Parramatta Female Factory and Institutions Precinct is situated within an institutional parkland area, in a low to medium-density mixed residential and institutional context. The Parramatta River banks, historically cleared and landscaped, are currently covered by dense vegetation.

All the mentioned institutions within the Precinct were government-run (including colonial government), with the exception of the Roman Catholic Orphan School which in its earliest phase was under a religious charity.

Currently, some of the buildings within the northern section of the Parramatta Female Factory and Institutions Precinct are used as hospital offices and community spaces. In the southern section, exhibitional and workshop spaces have been organised. For the non-Aboriginal people who were contained in the institutions, the Precinct today represents a centre for identity and belonging, protest and resistance, but also healing of wounds. For the Aboriginal communities, the significance of the space appears to be more complex, as people still deal with the trauma of cultural violence, and racist treatment of children who were deprived contact with their families and communities to assimilate with the larger society.

State of research

A detailed historical analysis of the development of the potential nominated property and the changing institutions that occupied the premises has been undertaken by the State Party. The *Parramatta North Historic Sites Consolidated Conservation Plan* (CMP) of 2017 (currently under review) is said to contain detailed analysis of the key significant built components and the related historical research completed.

Some archaeological work has been undertaken on the site since the 1990s, including test excavations. They included both pre- and post-contact period and, paired with historical research, provided important insights into the Aboriginal and non-Aboriginal history of the space, the treatment of the two groups of inmates, as well as contemporary social history of the Precinct. Archaeological investigations in the southern section of the Precinct have particularly revealed a range of artefacts and other elements strongly associated with the activities of children and young women, including dolls and toy tea sets, brassieres, sanitary pad belts, combs, nightgowns and paper ephemera such as collectable cigarette cards, pages from books and popular magazines. The names, ages and dates that feature prominently in the huge assemblage of graffiti and inscriptions within the preserved buildings, and especially in the southern part of the Precinct, recall the residents of this place, and point poignantly to their gender. It is more difficult to make such links in the northern section.

A collection of memoirs and other recollections recorded by previous occupants of the institutions provide an important first-hand record of historical events and the way of life within the different establishments. The Bringing Them Home Oral History Project conducted in 1998-2002 documented some of the experiences of Aboriginal girls, residents of Parramatta, and others.

Additionally, research, including oral histories, is currently being undertaken on the Aboriginal social history of the place, including the Dharug occupation of the land where the potential nominated property is located. It includes studies related to links of other Aboriginal communities to the area as well.

ICOMOS observes that research is advanced and the development of the Precinct in a historical perspective well understood. Studies relating to the earliest period of functioning of the Precinct, namely the Parramatta Female Factory, are abundant and the history of convicts brought to Australia well published. In this regard, ICOMOS notes the research and documentation work undertaken by the State Party for the nomination of Australian Convict Sites, inscribed on the World Heritage List in 2010. The history of the Parramatta Girls Industrial School is also well researched and a great number of significant publications are available, the topic of reformatory training schools which emerged in the mid-19th century as correctional institutions designed to rehabilitate young offenders is widely discussed nationally and internationally. As indicated by the State Party, studies have been undertaken and are continuing on the Aboriginal history of the area (both pre- and post-contact), including the particular experiences of the Stolen Generations. These includes ethnographic studies, oral histories and personal testimonies that show profound and lasting impacts of the forced removals on individuals, families and communities. ICOMOS also observes that limited historical and socio-cultural studies have been reported by the State Party in relation to the mental health facilities that functioned in the northern section of the Precinct, and particularly the lived experiences of their patients.

ICOMOS considers that the ensemble of buildings that is the potential nominated property is presented by the State Party as the seat of the varied institutions of welfare and behavioural control dedicated mostly, but not exclusively, to women and children. It is thus described using the historical functions of the buildings rather than detailing specific inherent qualities of the structures themselves that could be said to be tangible expressions of these functions. Understanding the architecture of the Precinct from this functional point of view is the more complicated that the spaces and buildings have undergone many modifications through the years to respond to the needs of each subsequent institution.

ICOMOS has included a compiled bibliography in Annex 1 of this report.

2. Proposed Significance of the Potential Nominated Property

2.1 Proposed global significance of the potential nominated property

Potential Outstanding Universal Value and proposed criteria¹

The potential nominated property is proposed as a testimony to the changing philosophies and approaches to the care and reform of women and children through forced institutionalisation and punishment, influenced by the European Enlightenment which suggested applying rational and scientific methods of addressing social and political issues through the 19th century. It throws light on the poor treatment and abuse of the vulnerable in the context of penal reform and social welfare, and the impact it had on the British colonial settler societies, the repercussions of which are felt until now.

ICOMOS considers that the proposed narrative, while persuasive and globally relevant, presents a number of challenges. It is developed around the historical process of change over time in ideas, policies and practices related to the institutionalisation of women and children in the context of searching for improvements in approaches to social reform through behavioural control and punishment. It has been acknowledged by the State Party that the mentioned evolution of social policies and practices linked to institutionalisation has not reached any decisive end that would indicate some kind of outcome or end of the process. It is merely the need for large-scale institutions that has declined, the Precinct being therefore said to be a reflection of a specific period in that unfinished process, rather than a potential symbol or example of the final resolution and decommissioning of such institutions.

ICOMOS observes that this process, whether on a policy or practice level, can hardly be in itself considered of outstanding significance. The evidence of changes does not effectively point to specific values inherent in transitions. It is an outcome that may be judged to be of a particular value. As the evolution of ideologies in itself is a common phenomenon, it is challenging to perceive it in terms of related values, whether universal or not.

ICOMOS further notes that the proposed narrative is rooted in universal themes of power, systemic inequality and enforcement of societal norms, but the proposed framing situates such institutions within a linear narrative that suggests a progression from barbarity toward more enlightened and humane systems of behaviour regulation. By constructing this modernist narrative, historical penal sites may be perceived as contributing to a myth of progress, where contemporary systems of punishment and regulation are legitimised and positioned as the natural evolution of civilisation. These framings obscure the reality that the core mechanisms of control, discipline, and institutionalisation are not relics of the past but ongoing practices that have merely shifted in form and focus over time. Accordingly, changes do not signify the end of the practices but rather their adaptation to new socio-political contexts. On a structural level, the loss of physical elements and transformation of structures in the Precinct are central to these narratives, challenging and revealing assumptions about progress and civility, as new walls are erected and old structures are removed for various populations, institutional expenses, and economic priorities.

ICOMOS also considers it difficult to see the preserved architecture of the Precinct, including the modifications of the structures and adaptation of spaces over the years, as a reflection of shifts in policies and practices, rather than as simple evidence of the repeated reuse of the place for similar purposes. It is the more so challenging when taking into consideration the difference between intent and the lived reality of

¹ICOMOS holds the sole and full responsibility for all aspects related to the assessment of criteria i-vi ("cultural criteria") whilst IUCN holds the sole and full responsibility for all aspects related to the assessment of criteria vii-x ("natural criteria"). ICOMOS will prepare PA Reports for requests based on cultural criteria, IUCN will prepare PA reports for requests based on natural criteria, and ICOMOS and IUCN will prepare in a coordinated manner PA reports for requests based on both cultural and natural criteria.

the residents/inmates, as recognised by the State Party, and the fact that the proposed evolution of welfare and punishment can be understood primarily in terms of associations, history and uses of the institutions, as the architecture itself is not presenting compelling evidence of changes. How these associations are directly and tangibly reflected in the potential nominated property is less convincing.

Furthermore, encompassing social, reformatory/educational, carceral, and mental health institutions that intertwined control with care, the Precinct illustrates themes of carceralism, colonialism, and disciplinary control over women and children for more than a century. The ensemble of buildings is presented as the main link between the varied institutions, which otherwise were governed by different laws and policies, and managed differently. It is challenging to equate women convicts, with mental health patients, children with behavioural problems with children who were simply racially discriminated, the poor, etc. and treat them as one group of the 'vulnerable' or the 'unruly', thus using seemingly the same colonial metric based on the by-gone society's moral assumptions and judgements without recognising the different experiences of individuals based on race, gender, age, class, religion, or other.

Criteria

The State Party proposed a potential nomination on the basis of criteria (iv) and (vi).

Criterion (iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;

This criterion has been justified by the State Party on the grounds that the Parramatta Female Factory and Institutions Precinct represents an outstanding example of an architectural ensemble that preserves the memory of several important stages in the forced institutionalisation of women and children from the 19th century to the modern age. It is considered to be an exceptional evidence of the evolution of welfare and punishment addressing social status of women and children, which illustrates their particular experiences as members of the society judged based on moral assumptions and existing social norms, and showcasing varied aspects of their institutionalisation over nearly two centuries.

ICOMOS considers that the way criterion (iv) is justified by the State Party repeats largely the justification of criterion (vi), the value of the potential nominated property argued based on its association to specific ideas and historical developments. In order to justify criterion (iv), the State Party would need to demonstrate that the Parramatta Female Factory and Institutions Precinct as an architectural ensemble can be considered exceptional in terms of its features, layout, structure or other as an expression of (a) significant stage(s) in human history. Given the focus of the narrative on women and children welfare and reform institutions, the specific character of the preserved buildings related to these groups within the society would further need to be convincingly argued. The way the complex tangibly reflects the shifts in ideologies, policies and practices through structural modifications in a way that cannot be witnessed in similar institutions in the relevant geo-cultural region would also need to be better substantiated.

Considering that the exceptionality of the potential nominated property, including its gendered and age-related character, is largely argued on the basis of associations and historical uses, rather than the architectural component which, as acknowledged by the State Party, does not represent the most compelling evidence of the gendered character of the potential nominated property or the process of policy and practice changes in relation to institutionalisation, ICOMOS considers that it would be challenging to justify criterion (iv) in line with the proposed narrative.

Criterion (vi): *be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance;*

Criterion (vi) is proposed by the State Party on the basis that the Parramatta Female Factory and Institutions Precinct is directly and tangibly associated with the evolution of ideas and social policy related to the treatment of members of the society considered to be vulnerable, resulting in forced institutionalisation of women and children seen as the state's measures of control and reform.

ICOMOS considers that the associations proposed as part of the justification of criterion (vi) are developed around the idea of changing social policies and practices, which, while globally relevant, does not point to specific outcomes that could be considered of global significance. The evolution of ideologies and policies in itself is a common phenomenon, and an ongoing process. Therefore, the justification for criterion (vi) is challenging. Moreover, the State Party has not set out convincingly why the tangible expression of these proposed associations in the form of the presented Parramatta Female Factory and Institutions Precinct should be considered exceptional compared to other similar sites. While the cultural institutional layering inscribed in the materiality of the site could be considered of significance in this regard, it is challenging to connect architectural changes within the potential nominated property to the evolving regulatory frameworks and the management or control of populations – especially since different populations in terms of race, age, gender, and class were kept by the varied institutions, where various regulatory frameworks applied depending on the function or purpose of the establishment. The adaptation of spaces does not appear to respond to the changing dynamics but rather addresses different needs of the changing institutions, which in itself is a common process.

Based on the provided information and considering the above-mentioned major challenges with the conceptualisation of the narrative in relation to the material evidence of the Parramatta Female Factory and Institutions Precinct, ICOMOS considers that it might be highly challenging justifying any criteria for the potential nominated property, unless the justification for Outstanding Universal Value is refocused (possible redirection is proposed in the section 2.3 below).

Comparative Framework

The State Party proposed to select comparators among sites that represent three key themes: forced institutionalisation of women and children, gendered sites (especially for females), age-specific sites (focus being on children). A substantial list of potential sites was provided, from among the properties on the World Heritage List, and other sites. Tentative Lists are yet to be analysed. Within the first theme, the State Party considered:

- Prisons and convict sites such as Australian Convict Sites (Australia, 2010, criteria (iv), (vi)) and Tower of London (United Kingdom of Great Britain and Northern Ireland, 1988, criteria (ii), (iv)); slavery-related sites such as Forts and Castles, Volta, Greater Accra, Central and Western Regions (Ghana, 1979, criterion (vi)) and Island of Gorée (Senegal, 1978, criterion (vi));
- Concentration camps such as Auschwitz Birkenau, German Nazi Concentration and Extermination Camp (1940-1945) (Poland, 1979, criterion (vi));
- Agricultural colonies such as Colonies of Benevolence (Belgium, Netherlands, 2021, criteria (ii), (iv)).

Among gendered and age-related sites, the following categories of potentially similar properties were identified:

- Religious properties related to specific experiences of men such as monasteries, e.g., Monasteries of Haghpat and Sanahin (Armenia, 1996, criteria (ii), (iv)), Gelati Monastery (Georgia, 1994, criterion (iv)), Sacred Island of Okinoshima and Associated Sites in the Munakata Region (Japan, 2017, criteria (ii), (iii)) or women such as convents or nunneries, e.g., Churches and Convents of Goa (India, 1986, criteria (ii), (iv), (vi)) and Convent of Christ in Tomar (Portugal, 1983, criteria (i), (vi));
- Women only prisons such as Mount Pleasant Female Prison (United States of America) and Surrey House of Correction/Brixton Prison (United Kingdom of Great Britain and Northern Ireland);
- Early children's prisons such as Parkhurst Prison (United Kingdom);

- Correctional institutions including industrial and reformatory schools such as Rauhe Haus (Germany), Mary Carpenter's Red Lodge (United Kingdom of Great Britain and Northern Ireland), Lancaster Industrial School for Girls (United States of America), St Joseph's Reformatory School for Girls, Limerick (Ireland), or Abbotsford Convent (Australia).

European Enlightenment through to the modern age has been suggested as the applicable chronological period. The countries that were part of the British Empire or under its influence were proposed as the general relevant geo-cultural region. But in the case of gendered and age-related sites, a potentially global scope could be relevant, according to the State Party.

Only one parameter for comparisons has been suggested, namely the evolution of punishment and welfare.

As explained in the previous section of this report, ICOMOS considers that the focus on the evolution of punishment and welfare is not appropriate, as the changes in themselves cannot be considered to carry particular values. Moreover, the proposed attributes of the potential nominated property – the complex of landscape, buildings, structures and archaeology dating from 1821 to the modern period – do not in themselves demonstrate this proposed evolution. This challenge appears to be acknowledged by the State Party who emphasised in the proposed comparative framework that the fabric of institutions is associated with the evolution of punishment and welfare of women and children, rather than expresses it. In fact, the evolution of institutional policies and the underlying ideological changes engendered by the Age of Enlightenment cannot be demonstrated by the architectural ensemble of the Precinct, since, as the State Party recognised, these changes were not realised through any substantial practical measures but remained at the level of ideas. The subtle changes in the landscape setting could indeed indicate some shifts in thinking about control and well-being of people, but the specific relationship of the built structures to their natural environment has been modified over the years. It is related to the changes in the institutions occupying the Precinct; the current set-up being established in line with requirements of the current circumstances. The simple change in the institutions occupying the Precinct and the related function of the buildings cannot be considered exceptional as it is typical for buildings to be re-used, sometimes accompanied by required modifications and adaptations of space.

With regard to gender and age-related sites, it is of note that none of the properties proposed as comparators have been recognised through inscription on the World Heritage List for that particular aspect, which appears to be more a characteristic of a particular institution (like a monastery or a school for girls) than of a structure itself. Indeed, architecture of male and female institutions from the time period under discussion does not seem to be specifically gendered. Similarly, in the potential nominated property, there is little if anything to be specifically gendered about the structure or lay-out of the buildings; the women's facilities were simply separated from the men's areas in cases where both were part of the complex. Therefore, while we can speak of gendered institutions in the case of the potential nominated property, it is challenging to see the site itself as being gendered. No specific features related to age of inmates have also been identified by the State Party within the Precinct. Considering that the same structures have been over the years used to house both females and males, adults and children, appears to confirm that while the narrative may be gendered, the site itself is not. Accordingly, for the purpose of the comparative analysis, the choice to limit the potential comparators to sites that speak to experiences of only one gender or a specific age-group should not be a given, but may depend rather on the choice of criteria used.

In terms of the proposed geo-cultural framework, ICOMOS considers that not all of the sites proposed as comparators within the theme of forced institutionalisation fall within the region suggested by the State Party. It therefore raises a question, whether indeed only British Empire and its colonies should be considered in this instance. To substantiate such a choice, the State Party would need to demonstrate that the system of punishment and welfare established by the British was in some way original, its characteristics or processes different from other colonial powers whose expansionist politics were driven by the same ideals of the European Age of Enlightenment. Otherwise it is unclear why similar systems established by the French, the Spanish, the Portuguese or the Dutch should not be considered.

Given the challenges with the current narrative developed around the evolution of forced institutionalisation of women and children presented through different institutions of control and punishment, ICOMOS considers that it will be challenging to propose an adequate comparative framework that would cover all the key facets of this complex theme and demonstrate the exceptional character of the site in this regards.

From among the different institutions considered in the current proposal, one which could potentially be further explored by the State Party as one tool through which the State delivered its system of control is the Parramatta Girls Industrial School. Industrial reformatory (also called residential) schools emerged in the 19th century as a response to the perceived social problems associated with the rapidly changing societies. They were part of a broader system of legal sanctions and welfare methods which developed its own particularities in different parts of the world. These social institutions played a very specific role in the colonial system in relation to the Indigenous populations. The school was a tool in the broader plan of assimilation and colonisation of Indigenous Peoples and their territories. And while the concept of reformatory or industrial schools evolved but remains operational in the form of child and youth care centers nowadays, residential schools for Indigenous children, Aboriginal children's homes, and other similar institutions of acculturation no longer exist, the fundamental rights of Indigenous communities to their culture, education, and knowledge, including languages, now being recognised and protected internationally. Accordingly, the reformatory industrial (residential) school as an example of a system that has now been eradicated in the context of social justice and human rights could be potentially explored further by the State Party for its global significance.

If the State Party decides to follow ICOMOS recommendation in this regard, a new comparative framework would need to be proposed, one which would focus on the industrial/reformatory/residential schools as part of the wider system of control and acculturation of Indigenous populations. The process of acculturation is complex and influenced by different individual and contextual factors which would need to be taken into consideration in a potential future comparative framework. However, while acculturation can be facilitated through various avenues, schools play a specific role in this process as they offer a structured environment where individuals interact with the dominant culture to learn its norms and values and develop a sense of belonging. Accordingly, in this case, the comparative framework could potentially focus on the intersection of age, race and colonialism to speak of specific experiences of children only. Within the broader context, sites that embody universal narratives of social justice, human rights, and the consequences of institutional control and oppression of Indigenous/colonised populations could be further considered. As a physical site used for forced assimilation, acculturation and control, the values of the potential nominated property, and in particular the Parramatta Girls Industrial School, would need to be appraised in this context. One additional aspect that may be taken into consideration is the evidence of sites that served confinement of both Indigenous and non-Indigenous children together, as Parramatta did. However, at this stage and within this Preliminary Assessment request, ICOMOS cannot ascertain that the potential nominated property would be sufficient as a stand alone site, or a serial nomination would be more adequate in this regard. In the latter case, ICOMOS notes that for serial properties, the comparative analysis would need to be carried out at two levels: among selected component parts, to assess whether they are the most appropriate to contribute to the potential Outstanding Universal Value, and to determine what the specific and original contribution of each component part is to the potential Outstanding Universal Value; and with other properties, to assess whether the series as a whole has no similar comparison.

The relevant geo-cultural region would need to be established upon an initial analysis of the educational systems of oppression and assimilation of local populations developed by the colonial regimes, to see if they differed in any substantial way or were particular to a specific colonial power.

Since the Preliminary Assessment request did not consider differences between Indigenous and non-Indigenous populations, there is no information in the proposed comparative framework about the potential comparators among Indigenous residential educational/incarceration institutions designed to control and assimilate children elsewhere in the world. The list of World Heritage sites contains sites that preserve pre-contact Indigenous cultural sites, and colonial sites such as missions, which may be of relevance. There are also a few properties that focus on the impacts of colonisation, such as Tr'ondëk-Klondike (Canada, 2023,

criterion (iv) inscribed on the World Heritage List. But there are even fewer, if any, that bring to light colonisation mechanisms, specifically the institutions that were used to move Indigenous Peoples from their autonomous pasts to their colonised presents.

In summary, ICOMOS considers that the current narrative developed around the evolution of forced institutionalisation of women and children pose a considerable challenge to propose a relevant comparative framework and prove the exceptional character of the potential nominated property along the lines suggested by the State Party. ICOMOS further considers that shifting the narrative to schools as tools of the colonial system devised with the aim of assimilation of Indigenous populations could potentially provide a better focus for developing a potential nomination. The fact that this system has been now eradicated and the fundamental rights of Indigenous Peoples recognised internationally promises to give this narrative a sufficient supranational historical and cultural breadth to justify potential Outstanding Universal Value. However, in this case, a new comparative framework would need to be developed around a set of parameters that would reflect the new proposed values and the attributes that would reflect them, to test whether the Parramatta Female Factory and Institutions Precinct could be considered an exceptional expression of this newly-proposed theme. At this stage, and with the available information, ICOMOS cannot ascertain that the Parramatta Girls Industrial School, located with the Parramatta Female Factory and Institutions Precinct, would be sufficient alone as a testimony of this system.

2.2 Integrity and Authenticity

The evaluation of the conditions of integrity and authenticity cannot be fully accomplished without the benefit of a technical evaluation mission to the potential nominated property. For the purpose of the Preliminary Assessment process, this section should be understood as providing preliminary considerations and, where possible, comments and recommendations about the issues that should be taken into account if a full nomination is developed.

The integrity and authenticity of a potential nominated property must be determined in relation to its potential Outstanding Universal Value and to the attributes that are necessary to express the proposed justification. Integrity relates to the completeness and intactness of the attributes of Outstanding Universal Value and to their lack of threats. Authenticity is assessed on the basis of the reliability of the sources of evidence and the documentation of the potential nominated property and its development over time. Both of these require the clear identification and conservation/safeguarding of attributes.

Integrity

According to the State Party, the attributes of the potential nominated property are the fabric of institutions associated with the evolution of punishment and welfare of women and children, i.e., the buildings, structures and archaeology dating from 1821 to the modern period, as well as the surrounding landscape. The potential boundaries includes the two historical sites that form the Parramatta Female Factory and Institutions Precinct, and further extends over the Parramatta River to the west and the park landscape of the adjacent Old Government House Domain (now Parramatta Park) as sympathetic elements. No buffer zone has been proposed at this stage.

The northern section of the Precinct has admittedly been changed substantially over the years, with many buildings being demolished and new ones added. From the original Parramatta Female Factory, only three buildings remain today and they have been altered too. Little physical evidence of the spaces inhabited by females that were patients of the Parramatta Female Asylum is visible today as the relevant buildings are no longer physically there. The southern section of the Precinct is better preserved. All the buildings from the initial phases of the development of this part of the Precinct are still in place, and parts of the landscape setting also are said to be preserved. In 2012, a fire damaged some structures in the southern section of the Precinct, which were now rebuilt using salvaged and new materials.

According to the State Party the potential nominated property is in a fair to good condition. Conservation interventions are ongoing. They are also aimed at preserving the overall legibility of the site, especially the southern section thereof. The State Party plans to develop the northern section further by potentially adding to the space or adapting it to new uses. Developments outside the potential nominated property are also envisaged.

ICOMOS notes that not all buildings within the Precinct are considered by the State Party to be potential attributes. It is unclear, however, from the provided description which structures are not and for what reasons. Furthermore, it is not entirely clear what historically linked the northern section of the Precinct, which was dedicated to institutions controlling women, to the southern one which housed institutions dealing until recently with children – both sites are presented separately by the State Party but are said to be read together as one institutional precinct. In what sense this precinct was seen as such in the past or is a contemporary interpretation is of concern.

ICOMOS further notes that the State Party proposed the potential nominated property as a cultural landscape but retained in the potential boundaries merely the ensemble of buildings and the nearby river, which apparently played a key role in the functioning of the different institutions. ICOMOS considers that the cultural landscape approach is not justified (as explained in section 2.3. of this report), as the natural environment was simply the context within which the ensemble of buildings was developed rather than was developed intentionally together with it.

ICOMOS further notes the advice of the State Party that a buffer zone delineation would be included in the next stage of the development of a potential nomination and would include provision of relevant protection mechanisms. The government plans of developing the area surrounding the Precinct were drawn to ICOMOS attention. While the setting of the place includes now low-rise buildings on three sides of the potential nominated property, further developments may apparently affect the visual integrity of the Precinct. These should be prevented, if any future nomination of the potential nominated property is being considered.

Authenticity

The State Party considers that the potential nominated property has retained its authenticity in terms of form and design, and materials (with some materials being reused), as well as feeling of the site. At the same time, changes to the landscape setting and the modification of the spaces (from open to enclosed to open) have admittedly affected the ability of the potential nominated property to reflect its full history. Changes have been substantially more pronounced in the northern section of the Precinct but, according to the State Party, the site still presents a moderate to high degree of authenticity.

ICOMOS considers that it is challenging to address the condition of authenticity on a site whose proposed values are linked to the process of change itself. In such a case, it is unclear which stage of the development of the Precinct should be considered at the basis for assessment, and in what sense the subsequent demolition or addition of structures could be considered part of the historical process and thus also part of the way the potential nominated property is said to convey the proposed values. As authenticity of a property is related to its ability to convey the values it is said to express, the major challenge with the potential nominated property in terms of its condition of authenticity lies in its current articulation of justification for Outstanding Universal Value. While the sources of historical evidence and the documentation of the potential nominated property gathered by the State Party may be adequate, the fact that its values are linked to the development over time of the site, makes it challenging to identify attributes that would convey the potential Outstanding Universal Value. Thus the authenticity of the potential nominated property, as defined by the *Operational Guidelines for the Implementation of the World Heritage Convention*, cannot be confirmed either.

In light of the need for more reflection on the justification for potential Outstanding Universal Value, as suggested throughout this report, and potential redirection of the narrative, ICOMOS considers that it is difficult to provide further advice on integrity and authenticity of the potential nominated property at this

stage. Considering the issues with integrity and authenticity of the northern section of the Precinct, ICOMOS believes that shifting the narrative along the lines proposed in this report and focusing on the theme of institutionalisation of children only, would allow to overcome some of the limitations related to the state of preservation of this part of the potential nominated property.

2.3 Nomination strategy proposed by the State Party

The State Party proposes the Parramatta Female Factory and Institutions Precinct as a single site and a cultural landscape that illustrates the evolution of approaches to behavioural control and reform through punishment of women and children by means of forced institutionalisation from the 19th century till modern times. It is said to bear witness to the lived reality of these vulnerable groups within the society, who faced abuse based on moral assumptions and judgements imposed on those who lived in poverty or were considered to be outside social acceptability. The potential nominated property is presented as an example of a gendered and age-related site.

With regard to the proposal of the State Party to see the potential nominated property as a cultural landscape, ICOMOS observes that the way the potential nominated property has been described in the Preliminary Assessment request – as an ensemble of buildings defined through their historical functions – makes it unclear in what way the State Party understands Parramatta Female Factory and Institutions Precinct in terms of combined works of nature and of human. For instance, no techniques of sustainable land use have been defined in relation to the potential nominated property, and no spiritual relationship to nature that the site could reflect is mentioned. There is no information on how the Precinct could be said to represent human interaction with the environment either, save for the use of some of the natural features such as the nearby river or open space to enhance the function of the institutions. This, however, is not sufficient to consider the Parramatta Female Factory and Institutions Precinct a cultural landscape. In the World Heritage context, and according to the *Operational Guidelines for the Implementation of the World Heritage Convention* (Paragraph 47), a cultural landscape is a property that is “*illustrative of the evolution of human society and settlement over time, under the influence of the physical constraints and/or opportunities presented by their natural environment and of successive social, economic, and cultural forces, both external and internal*”. There must therefore be evidence of purposeful interaction of humans with their environment beyond the use of natural resources. Accordingly, ICOMOS considers that the cultural landscape approach proposed for the potential nominated property is not relevant.

In terms of the proposed narrative, as mentioned elsewhere in this report, ICOMOS observes that the potential nominated property has been presented as an illustration of the process of change in policies and ideologies that have seen institutionalisation evolve over the years. This is argued based on the fact that the Parramatta Female Factory and Institutions Precinct transitioned through various roles, including incarceration and convict management, child welfare, and mental health, along the changing practices of punishment, morality, and reform. This approach is problematic since the evidence of changes does not effectively points to specific values inherent in transitions. The process of change or evolution in itself is a common phenomenon. It is the outcome of a process that can be said to hold a particular value.

The Precinct is further said to bear witness to a particular period in this evolution of institutionalisation, linked to the spread of the thinking engendered by the Age of Enlightenment. In response to the moral and social principles that proliferated at that time (though their origins may be traced back to the Medieval times in Europe), large institutions were established in the 19th century as a result of a shift in thinking about institutionalisation as required only for the criminals, to seeing it as a conducive environment to bringing about behavioural change in other segments of the population, through punishment. The State Party argues that the long history of successive uses of the Parramatta Female Factory and Institutions Precinct reflects the failed attempts of the governments at containment, control and reformation of women and children and is a poignant lesson of the need to reform the system built on the abuse of the vulnerable rather than their

rehabilitation. However, ICOMOS considers that it is challenging to see in the potential nominated property a reflection of this particular ‘moment’ in institutional practice, especially taking into consideration the history of the Precinct spanning almost two centuries. And while the philosophy of the European Enlightenment is no longer dominant and the methods used in today’s institutions are different, institutionalisation itself is not a relic of the past. There has been no particular outcome of the presumed process of change, as the system persists, albeit under different forms.

ICOMOS further notes that the notion of rehabilitation through labour and discipline, which was part of the Age of Enlightenment philosophical underpinnings, was used by the State Party earlier, as the basis for the development of the nomination of the Australian Convict Sites, inscribed on the World Heritage List (2010, criteria (iv), (vi)). In fact, the State Party had considered Parramatta Female Factory as potentially an individual site appraised for its convict history and values, or a potential extension to the Australian Convict Sites World Heritage property. Eventually, neither option was chosen given the Australian Convict Sites property which includes the Cascades Female Factory. In the case of the Australian Convict Sites the notion of rehabilitation was tangibly demonstrated through the remains that testified to the moral, legal, and material objectives of forced labour in penal colonies, such as the infrastructure, buildings, landscape, and other material evidence. In the current case, as mentioned above, this tangible expression is not sufficiently rich. Moreover, this reappearing theme is used, in the current case, to try and link varied institutions that occupied the same ensemble of buildings, instead of focusing on one institution and show how the system was delivered through a specific infrastructure, as was the case of the Australian Convict Sites. ICOMOS considers that this approach will not be successful for a number of reasons detailed below.

According to ICOMOS, the way the justification is presented may appear to be contradictory. It is argued that the Precinct provides evidence of the shifting approaches to institutionalisation, while at the same time it is said to witness to the lived experience of women and children who were institutionalised. There was, however, as explained by the State Party, a marked difference between intent and the lived reality – i.e., between the changing theories of care and the related seemingly progressive policies that governed the institutions and the lived experience of people who were their victims. The visible change, as pointed out, was often only just in the name of the institution, not in any practical ways.

Furthermore, there is not much in terms of the actual tangible fabric of the Precinct that could be said to demonstrate the said shifts in ideologies and approaches. The buildings appear to be simply witnesses of an entrenched system of mistreatment and control perpetuated by varied institutions over many years. The structural modifications of the place, including the lost buildings, were in fact mostly a result of shifting needs of the changing institutions rather than shifting modes of operation. In this regard, the natural environment of the Precinct played a crucial role, being used differently in line with the changing functional needs of the institutions – e.g., open vs walled spaces, created for control; connection to the river for work or healing purposes. However, this dimension appears imperceptible today due to subsequent redevelopments and modifications of the place.

In addition, ICOMOS notes that besides the focus on the shifts in ideas related to institutionalisation, the narrative of the Parramatta Female Factory and Institutions Precinct revolves around a particular section of the society, namely women and children. Gender, race, and age have historically been the primary organising forces in regulating and controlling populations. Grounded in Enlightenment-era ideologies, these social locations functioned as a biological and social framework through which nation-states managed populations to ensure health, economic growth, and social viability. This organisation relied heavily on institutions that governed gender, sexuality, marriage, reproduction, and childcare as instruments of population management and colonial expansion. The gendered and age-related nature of the potential nominated property is used by the State Party to argue for its importance, as it is said to be filling the gap on the World Heritage List. However, ICOMOS considers that it is challenging to see this gendered nature of the potential nominated property through the built fabric of the Precinct. As explained by the State Party, it is expressed mostly through intangible aspects, namely the development of separate institutions for women and children, historical uses of the institutions, and the associations, such as the connection of the Female Factory to the

river for textile production by convict women, or the gendered character of the trades or skills promoted in the Parramatta Girls Industrial School and later institutions, such as cooking, laundry work and other domestic duties. The architecture is not the main evidence of that character as it generally followed standardised layouts and forms for institutions of the time, which were not gendered. The question therefore is whether the potential nominated property can be said to be of gendered (and age-related) character (especially that some of the institutions in the Precinct comprised spaces for both females and males) or the narrative itself is gendered, and if so this narrative can or cannot be said to be tangibly reflected on the site. ICOMOS considers that it is the former and the built heritage that forms the core of the potential nominated property does not appear to be sufficiently distinct in this regard to justify the claims.

Besides gender and age as social locations used by the State Party in relation to the varied institutions that the Precinct housed, there are also other social variables which, while mentioned in the Preliminary Assessment request, have not been taken fully under consideration. The State Party argues that the general purpose of the varied institutions as places of welfare and reform dedicated to women and children is what connects the different establishments within the Precinct. ICOMOS, however, considers it challenging to see the varied institutions of social, carceral, educational or mental health-related character under one common tag, which seems to liken penal or carceral establishments with mental health facilities or orphanages. As mentioned earlier in this report, while all these institutions intertwined control and punishment with care, different laws and regulations applied in each of them, and different circumstances led to people being locked in them. These circumstances were sometimes out of the inmates control. This, for instance, applies to Aboriginal people who were forced into the institutions solely due to racial discrimination. The Preliminary Assessment request mentions the racial, social, faith-based and class differences between the women and children of the Precinct but does not delve much into details. In fact, the link between women and children themselves, and thus the different sections of the Precinct, is unclear. This is further problematic, considering the fact that the Precinct is presented as a witness to the lived experiences of the women and children locked in the institutions, and these women and children were subject to colonial social hierarchies. In ICOMOS' view, this aspect of the narrative requires an approach that would disentangle different realities of Aboriginal and non-Aboriginal women, settlers and convicts, inmates/patients of the institutions and their personnel, etc., in order to present them convincingly rather than hiding the differences under one gender/age category. Indeed, different social locations can be observed in the institutional system itself. For instance, in the Female Factory existed a classification which stratified women into three classes based on their perceived moral and social worth. These classifications were not merely hierarchical but were instrumental in facilitating the control of women's sexuality and reproductive potential, thereby supporting the colony's broader goals of economic and population expansion. A similar distinction can be made when comparing circumstances under which Aboriginal and non-Aboriginal children were brought to the institutions. Institutions for the incarceration of Aboriginal children were usually segregated such as the Cootamundra Girls' Home and Kinchela Boys' Home. In some instances, however, Aboriginal children could also be placed in institutions that included non-Aboriginal children, like in the case of Parramatta Girls Industrial School. The pathway to the institution and fate on departure of the Aboriginal and non-Aboriginal children were, however, distinct.

Given the complexity of the proposed narrative in this regard, the key challenge, according to ICOMOS, is the ability of the potential nominated property to reflect in tangible ways these different variables and the nuanced stories of women and children through the material evidence of the site. Therefore, while the narrative is interesting and multi-layered, it requires both the historical analytical lens, which the State Party partly provided in the Preliminary Assessment request, and the intersectional lens, which is largely missing at this stage, to articulate convincingly, on the one hand, the cultural, political, and social context of the Precinct and, on the other hand, the various social realities that coexisted in this space. ICOMOS notes that research in this regard has been conducted to some extent. ICOMOS considers that the inclusion of many strands within the proposed narrative, some of which are only loosely connected to others through the common location (the Precinct itself), affects its cohesiveness. ICOMOS also considers that the potential nominated property is not sufficient as the tangible expression of the full proposed narrative, considering the aspects discussed above.

Based on the above discussion, ICOMOS considers that the proposed nomination strategy does not have the potential to be successful. However, having considered the different aspects of the presented narrative and the different institutional layers of the Precinct, ICOMOS considers that the Parramatta Girls Industrial School as an example of a residential reformatory school that was part of the project of institutionalisation of Aboriginal children to assimilate them with the wider society appears to be the strongest contender in terms of potential for regional or global significance. It is linked to the history of the Stolen Generations, which represents a significant period in Australia's history when Aboriginal and Torres Strait Islander children were forcibly removed from their families and denied their cultures. This part of the narrative of institutionalisation is a particularly strong point, as it is internationally recognised and speaks to the broader topic of the oppression and acculturation of Indigenous populations related to settler colonialism. Accordingly, ICOMOS considers that this theme could be worth exploring further, as it appears to offer some potential for development in terms of Outstanding Universal Value. Focusing the narrative on this particular period in history, and a specific 'experience' of Indigenous children, seems to be a much more promising way forward that would, at least partly, be able to overcome some of the challenges of the current narrative.

This theme does not come up strongly in the current Preliminary Assessment request. In fact, while ICOMOS notes that the Parramatta Precinct is the New South Wales focus for the Stolen Generations, the way the history of the potential nominated property is presented in relation to the Stolen Generations is rather tenuous. It is therefore impossible for ICOMOS to advise in the frame of this Preliminary Assessment request whether the potential nominated property (or rather the southern section of it only) could be considered sufficient as a testimony to the aspects of the Stolen Generations' story that the State Party could eventually decide to develop the narrative around. Moreover, ICOMOS notes that the documentation indicates that Indigenous Peoples in Australia (and beyond) were regulated separately. The segregation of Indigenous Peoples largely excluded them from legal protection and due processes, as well as other social entitlements. Institutions for Aboriginal children were usually separate as well. Parramatta Girls Industrial School represents one of those cases where both Aboriginal and non-Aboriginal children were placed together, albeit for different reasons. It seems to be therefore just one element of the story of institutionalisation of Aboriginal children. Accordingly, it may be necessary to consider adding other sites that would together present the narrative, depending on its eventual focus. A homogenous selection of sites, connected to each other through social, cultural or functional links in the past, would need to be made in such an instance, illustrating the diversity of human and historical values associated with these places, or potentially different types of establishments that would give testimony to the system. Moreover, a deeper reflection would be needed on the different experiences of Aboriginal and non-Aboriginal children to decide whether the narrative of Stolen Generations is stronger alone or could/should be presented together with the story of forced institutionalisation of non-Aboriginal children, which was based on different reasons. The narrative of the forced assimilation and abuse of Indigenous children should in no way devalue the history of non-Indigenous inmates in these institutions. As the institutionalisation via education aimed at Indigenous children has received a great deal of public attention in the last thirty years, a relevant justification for including both stories together, if the State Party so decides, would need to be developed in this case, which may be challenging considering the already mentioned differences between the two segments of the society. ICOMOS further considers that this potential alternative narrative may not necessarily be more convincing when focused on girls only; including boys (and boys' schools) could possibly be found to enhance it, offering a better picture of the treatment of minors (whether only Aboriginal or non-Aboriginal too).

ICOMOS notes with interest that the lands on which Parramatta Precinct is standing today have significant Indigenous values attached to them by the Dharug communities who are the traditional owners of this area. How to articulate the potential justification for inscription around the history of Stolen Generations (including or not stories of non-Aboriginal children too) would require close collaboration with the Indigenous communities and their free, prior, and informed consent.

An additional key point for shifting the focus to the institutionalisation of Indigenous children is the fact that this process has had an end of some sort, even if its impacts are still felt. The rights of Indigenous Peoples in Australia and all over the world have been since formally recognised by the global community and the rights

of children have also been institutionalised through national and international laws, policies and institutions. In this light, the State Party could explore how the Precinct's history (alone or combined with other potential sites) has shaped contemporary discussions on justice, gender equality, and social reform in regards to Aboriginal/Indigenous people, and children in particular.

Finally, ICOMOS considers that a new children-focused narrative would be contained within the southern part of the Precinct, which would help with the issues of integrity and authenticity observed in the northern part thereof. The southern part retains relatively more intact evidence. Moreover, objects and features of the potential nominated property (graffiti) associated with children that were found in this section of the Precinct would complement the potential attributes.

2.4 Preliminary considerations for protection and management

The potential nominated property belongs to the government of the New South Wales but is situated on the Burramatta land of the Dharug Nation. It is included on the National Heritage List and protected at the highest available level in Australia. The Parramatta River and its relationship to the Precinct is excluded from this protection. The potential nominated property is also on the State Heritage Register as two separate sites, and is part of the relevant Heritage and Conservation registers that ensure its protection as a heritage asset.

The Precinct has been included in a number of local plans to ensure control of development in the area. It is located immediately adjacent to one of the convict sites that form part of the World Heritage Property of Australian Convict Sites inscribed in 2010.

The site is managed by Property and Development NSW (PDNSW), a New South Wales Government agency. It has a conservation management plan in place, which is currently under review.

ICOMOS notes the administrative arrangements of the site. It also notes a list of Aboriginal Associations connected to the site that the State Party has provided. It is however unclear at this stage whether any of them are involved in any way in the management of the site, especially given the traditional ownership of the land by the Dharug people, and the role of the Parramatta Precinct as the New South Wales focus for the Stolen Generations. If a potential future nomination is developed, it would be necessary to clarify these and explain in more detail how the traditional custodians and other Aboriginal communities whose histories are strongly connected to the potential nominated property will be included in the decision-making.

ICOMOS further notes that the New South Wales government is currently rezoning the area immediately to the north and east of the potential nominated property. It appears to be designed to encourage development of high-rise residential and commercial buildings up to the boundaries of the potential nominated property, including in any potential future buffer zone. ICOMOS considers that relevant protective measures of the immediate surroundings of the Precinct would be necessary, if a potential nomination is sought in the future. Given the strong relationship of the potential nominated property to its natural environment, as emphasised by the State Party, the landscape setting of the Precinct should be given more attention by the State Party.

2.5 Involvement of Indigenous Peoples and Local Communities

The State Party has consulted with both the Dharug community, who are the traditional owners of the land where the Precinct is located, and the different Aboriginal groups, through their associations or individuals, who are connected in one way or another to the potential nominated property, including the representatives of the Stolen Generations. These consultations followed earlier engagements with Aboriginal stakeholders as part of the development of the Tentative List.

At this stage, free, prior and informed consent has been given for the general idea of a World Heritage nomination, in writing or during recorded interviews. Consultation is ongoing and additional Aboriginal stakeholders may be identified and will be included in the consultation process. There will also be further engagements, if any draft nomination is developed; the issue of consent will then again be explored. A list of relevant Aboriginal organisations and individuals engaged thus far was provided by the State Party with ways of engagement described (based on the wishes of the Aboriginal communities); additional information on the workshops held with Aboriginal representatives was also provided.

ICOMOS observes that further development of a potential future nomination will include continued engagement with Aboriginal communities and seeking free, prior and informed consent for the nomination. However, ICOMOS notes that the State Party refers to the Aboriginal groups involved in these processes as 'stakeholders' and not as 'rightsholders'. Accordingly, it is unclear to ICOMOS at this stage what role these Aboriginal communities play in the identification of potential values for which the site could be eventually proposed, whether their Indigenous values have been considered, how, if at all, the current interpretation of the Precinct relates to the Aboriginal meanings associated with the site, and how these people are or would be in the future involved in the management and conservation of the potential nominated property, given their historical rights and associations. All these questions would need to be addressed by the State Party, if a nomination is developed. It would be the more so crucial if the potential alternative justification is proposed along the lines recommended by ICOMOS in this report.

2.6 Documentation

It appears that the State Party is in possession of the inventory of all the buildings within the Precinct and has documented the historical development of the area, including the changes and modifications to the spaces and the structures. The *Parramatta North Historic Sites Consolidated Conservation Plan* (CMP) of 2017 (currently under review) apparently includes detailed analysis of the key built components within the Precinct and outside of it, as the CMP relates to a broader area. While excerpts of the document have been shared by the State Party, including the graphic representation of the evolution of the built environment of the Precinct, it cannot be confirmed at this stage whether it is comprehensive.

The conservation works undertaken on a range of buildings in the Precinct have been documented and the conservation programme is said to be ongoing. However, it is unclear at this stage what these interventions included and which buildings were or are currently targeted. In 2012, a fire damaged some of the buildings in the southern section of the Precinct, which are said to have been reconstructed using salvaged and new materials. The State Party has conducted additional conservation works to enhance the legibility of this part of the site.

Moreover, the changes to the surrounding landscape have been briefly discussed by the State Party in the Preliminary Assessment request and additional information. It is understood that the documentation of the original landscape setting comprises archival records, including photographs. The subsequent interventions in the natural environment of the potential nominated property and the evolution of the landscape setting of the Precinct is not clearly explained, so it is challenging to assess which features could or should be considered as potential attributes.

Given the many modifications of the built fabric of the Precinct, and if a potential future nomination is envisaged, it would be necessary to provide sufficient documentation to trace the process of structural change in the Precinct and later restoration interventions to be able to substantiate the claims of integrity and authenticity.

3. Conclusions of the Preliminary Assessment, Potential Way Forward and Recommendations

Parramatta Female Factory and Institutions Precinct is proposed by the State Party of Australia as a site that illustrates the evolution of approaches to behavioural control and reform through punishment of women and children by means of forced institutionalisation starting in the 19th century till modern times. The potential nominated property is further suggested as a testimony to the lived experiences of women and children as the vulnerable groups within the society, who faced abuse based on moral assumptions and judgements imposed on those who lived in poverty or were considered to be outside social acceptability. The potential nominated property is thus presented as a gendered and age-related site. It is proposed under criteria (iv) and (vi), and as a cultural landscape

ICOMOS observes that the potential nominated property is presented as an ensemble of buildings that housed over almost two centuries different institutions of welfare and behavioural control. Modified, demolished, and adapted over the years, the structures of the Precinct and its spaces have served varied functions that included carceral/penal, health-related, educational/social and corrective facilities. While the landscape setting played an important role in the philosophy behind institutionalisation, ICOMOS considers that it served merely as a conducive context for the development of the Precinct and was not developed together with the ensemble of buildings. Accordingly, the cultural landscape approach is considered inadequate.

ICOMOS further considers that the proposed narrative developed around the evolution of forced institutionalisation of women and children is challenging as the process of change, whether on a policy or practical levels, is a common phenomenon, and the evidence of changes does not effectively point to specific values inherent in transitions. In this case, the said evolution has not achieved any end in itself, as institutionalisation, albeit under different forms, remains in place. In addition, the way the justification has been conceptualised, it does not appear to find sufficient expression in the material evidence of the Parramatta Female Factory and Institutions Precinct. The shifts in welfare and punishment can be understood primarily in terms of associations, history and uses of the institutions that functioned within the Precinct rather than the built heritage of the potential nominated property itself. Similarly, ICOMOS considers that the gendered and age-related character of the potential nominated property, which the State Party indicated as filling a potential gap on the World Heritage List, can be questioned. There is little if anything to be specifically gendered about the structure or lay-out of the buildings of the Precinct, the ensemble corresponding to standardised layouts and forms for institutions of the time, which were not gendered.

ICOMOS considers that the proposed narrative is very complex from a historical point of view and requires the use of both the historical analytical lens to understand the cultural, political, and social context of the Precinct and the intersectional lens to account for the many social realities that coexisted in this space. The multiple historical layers included in the proposed narrative cannot be convincingly and tangibly reflected through the potential nominated property. Accordingly, ICOMOS considers that it might be highly challenging justifying any criteria for the Parramatta Female Factory and Institutions Precinct.

ICOMOS, however, considers that exploring the possibility of refocusing the narrative to just one aspect of the current justification, namely the reformatory/industrial/residential schools as colonial tools of assimilation of Indigenous populations within colonial settler societies, could potentially provide a more promising option for developing a potential nomination. The fact that this system has been now eradicated and the fundamental rights of Indigenous Peoples recognised internationally provides a good basis for a narrative of sufficient supranational historical and cultural breadth to justify potential Outstanding Universal Value. However, in this case, a new comparative framework would need to be developed around a set of parameters that would reflect the new proposed values and the relevant attributes that would reflect them, to demonstrate whether or not the potential nominated property, and specifically the Parramatta Girls

Industrial School, could be said to stand out among other similar sites in a relevant geo-cultural context. At this stage, and with the available information, ICOMOS cannot ascertain that it would or that it could be sufficient alone as a testimony of the said system.

ICOMOS FINAL RECOMMENDATION

The Preliminary Assessment of Parramatta Female Factory and Institutions Precinct suggests that there is no potential for the potential nominated property to justify World Heritage criteria and become a robust nomination along the lines proposed by the State Party.

Based on the available information, ICOMOS concludes that a part of the potential nominated property – the Parramatta Girls Industrial School in the southern section of the Precinct – might reveal to be significant if the narrative is shifted to the institutionalisation of Indigenous children as part of the colonial system and its policy of assimilation. In this regard, a major reflection of the new theme would be required and a completely new focus and nomination strategy proposed. At this stage, and within the framework of this Preliminary Assessment request, ICOMOS cannot confirm whether the Parramatta Girls Industrial School could alone be considered sufficient to justify consideration for the World Heritage List under such a revised narrative.

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