

Guidance on the Minimum Standards for the transfer of archaeological assemblages to museums in Scotland v1.0

2021 Consultation Report

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Executive Summary

Following the recognition that archaeological assemblages are frequently deposited in museums with issues such as poor packaging, lack of basic cleaning and conservation, a new draft guidance for such assemblages was created. This guidance sets out procedures and minimum standards for the transfer of archaeological assemblages to museums in Scotland, which operates under a different legislative system from the rest of the UK. Its aim is to ensure that archaeological material is transferred appropriately packed and in a stable condition, accompanied by the documentation necessary to understand and use the assemblage once it has been added to the museum's collections.

Funded by Historic Environment Scotland, a consultation on the draft Guidance was led by the Association of Local Government Archaeological Officers, National Museums Scotland, and the Museum Working Group of Scotland's Archaeology Strategy. The consultation was undertaken in the winter of 2020/21, and in total 19 responses were received representing all parts of the sector.

Key results include establishing that there is overwhelming support for the introduction of such minimum standards, that their implementation should be for all parts of the sector with the exception of chance finds made by members of the public and metal-detectorists, and that the new standards will not be applied retrospectively. Furthermore, a total of 20 recommendations, including the creation of four short-lived working groups, have been made in order to ensure that the final version of the standards are fair, practical, comprehensive, understandable, and supported by the sector.

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1 Introduction

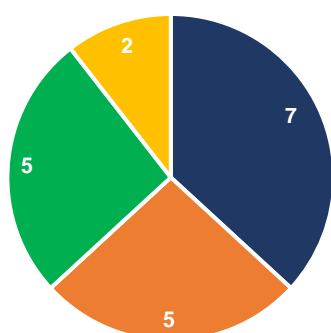
- 1.1 This report presents the results of a consultation undertaken as part of the ‘Before the Museum’ Project. This is a one-year project which has been developed by the Scottish Archaeology in Museums Working Group as part of Aim 3 ‘Caring & Protecting’ of Scotland’s Archaeology Strategy (2015). The project addresses the first of three work strands identified by the Working Group as areas to focus on for the improvement of processes and partnership working (the work strands being 1- ‘Before the Museum’, 2- ‘At the Museum’ and 3- ‘Access to knowledge / expertise / skills’). The project, which commenced in April 2020, is led by the Association of Local Government Archaeological Officers Scotland (ALGAO Scotland) and National Museums Scotland (NMS), and funded by Historic Environment Scotland (HES).
- 1.2 The aim of the project is to provide a stronger bridge between archaeological fieldwork and museums. Through a series of workshops with museums, Treasure Trove, and local authority representatives, held during 2018 and 2019, the priorities and actions to achieve this aim were identified. The final outcomes seek to improve the creation of the artefacts element of archaeological archives and streamline their accessioning into museum collections.
- 1.3 As part of this project, a draft set of procedures and minimum standards for the transfer of archaeological assemblages to museums in Scotland was written in the autumn of 2020. This was the first step in arriving at a solution to one particular issue identified in the *‘Depositing Archaeological Finds & Assemblages in Scottish Museums 2020 Survey Report’* which identified that 55% of all chance finds and assemblages deposited are not in a state deemed to be ‘museum ready’. Following the release of the Minimum Standards Guidance a consultation was undertaken between the 14th December 2020 and 8th February 2021 across Scotland, the results of which are presented in this report.

2 Methodology

- 2.1 The consultation was designed to collate feedback from representatives across the sector who would be impacted by the introduction of new minimum standards for the transfer of archaeological assemblages to museums. The draft Guidance, along with this consultation, is envisaged as the first step in agreeing a new sector-wide standard which addresses long-term issues experienced by museums, and aids those preparing assemblages for deposition.
- 2.2 The consultation utilized the Microsoft ©Forms platform through the Aberdeenshire Council corporate account. It was issued on the 14th December 2020 via 106 targeted email contacts, Twitter, the Chartered Institute for Archaeology Scottish Branch, Museums Galleries Scotland, and regional museum forums. Two follow-up calls by the project team for participants were made via email and social media while the consultation was open, with the consultation ending on the 8th February 2021. In total the consultation ran for eight weeks, though it should be noted part of this fell over Christmas and New Year and all of it fell within a Covid-19 lockdown.
- 2.3 Upon closure of the consultation all the results were collated in Excel. Where conflicting or incomplete responses were encountered, clarification was sought from the original responding organisation.

3 Overview of Responses

- 3.1 The survey received 20 usable responses representing 19 different organisations or individuals.



Overview of Responses

- Museums
- Commercial Archaeological Companies and Individuals
- National Organisations
- Others

Those responses can be broken down further into the following types:

- 7 museums
- 5 national organisations (2 of which have UK-wide remits)
- 4 commercial archaeological companies (or ‘units’)
- 1 independent archaeological contractor
- 1 local authority archaeology service
- 1 individual

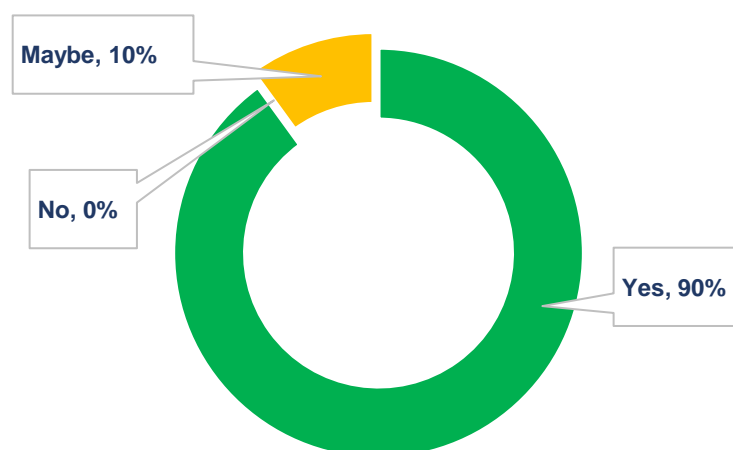
Of these responses all museums noted themselves as having ‘accredited’ status except for one which was ‘provisionally accredited’. The response from the individual was based on both their own archaeological experience and those of a former museum curator with whom they liaised for this consultation.

- 3.2 There were no blank responses or duplicates by the same individuals, but there was one instance of multiple answers from the same organisation. These were checked and distilled down to one answer for that organisation as no conflicting answers had been provided by the two respondents. As a result, a maximum of 19 responses were attributed to any individual question within the consultation.
- 3.3 For all usable responses used in the survey analysis, information on their contact details, type of organisation, and willingness for such data to be held in accordance with GDPR was provided.

4 Overall concept of introducing minimum standards guidance

4.1 Consultation Feedback on concept of introducing minimum standards guidance

Do you support the introduction of minimum standards guidance for the transfer of archaeological assemblages to museums in Scotland?



4.2 Consultation Discussion on the concept of introducing minimum standards guidance

When setting out the initial draft for minimum standards it was recognised that this was in response to an identified issue from a museums' experience. The intention has always been for the next drafts of the guidance to be developed in partnership with wider representation from the sector, but before that could happen this consultation needed to understand the rest of the sector's reaction to such standards being introduced.

The overwhelming positive reaction to the principle of standards being introduced has been hugely encouraging. The notes of caution, coming largely from outside of the museum sector, relate to practicalities of ease of use, cost recovery, and the relationship with the Treasure Trove process, and are issues which the project team recognise and agree with. The results of the consultation support the continuing development of the standards, and the

need for sector-wide agreement to be reached on them before they are formally adopted.

5 Guidance Section 2 ‘Fieldwork, Excavation and Recovery’

5.1 Consultation feedback: comments or proposed amendments to Section 2 of the Guidance

In total 2 respondents provided no response at all to this question, 6 confirmed no amendments were required, and 11 provided comments. These comments have been grouped below according to common theme. Note that some of the respondents gave responses that have been split between the groups. ‘Section’ references within quoted comments refer to the draft standards consulted on, while ‘Section’ references not within quoted comments refer to sections within this consultation report.

5.1.1 General comments

- i. “All good.”*
- ii. “No changes - think its fine.”*
- iii. “Relevant to consideration of the related new draft guidance for the transfer of assemblages is a failure in the ‘2020 Feasibility Report on Implementing a Museum Processing Fee for Archaeology in Scotland draft’ - an apparent retreat from developing an approach that can meet the tests in Planning Circular 4/1988 and hence embed the accessioning fee into the elements of the PERD controlled through the condition. To meet these tests, it is essential that TTU flex their process flow-chart for excavated assemblages to one that gives Provisional Claim status to an assemblage post-fieldwork but pre-analysis. This would enable the archaeological contractor to advance an accession fee within their costed PERD much as they would publication fees (where relevant). Hence making this a controlled element of the planning process and ensuring the condition is not discharged without accessioning*

fess committed to where relevant – and indeed discussion of the destination of the assemblage where Provisional Disclaim occurs. To leave it as a ‘goodwill’ structure would be a recipe for non-compliance and ultimately either abuse or the collapse of the structure.

- iv. A Provisional Claim status would also assist in a problem of the one-size approach adopted in the ‘Museum Archaeological Archiving Standards Consultation Draft 1.0’ – the standards identified may appear reasonable for significant assemblages but are punitive for ‘dross’ sites that will never be claimed. ORGANISATION BLANK appreciates that our members can pitch their behaviour to the likely outcome of the TTU process, but this introduces significant uncertainty (and hence financial risk) for borderline projects – here we are thinking especially of these where we recommend no further work ... what if TTU Claim and suddenly, long after the Client has left, we are advised of accession fees and analytical / conservation work required on multiple bags of 19th-century metalwork? If the Draft Standards migrate to a document for those assemblages that have a Provisional Claim set against them, the funding is established to meet all standards and fees at the start of the process. Yes, there remains a degree of risk, but this is suppressed and placed within those projects that remain subject to fees.”*
- v. “If all of this can be achieved it will be wonderful and really help our organisation and the small team we have.”*
- vi. “We recognise that the Treasure Trove system has led to a situation where there is no clear responsibility for improving processes for sustainable selection practices. However, there is an opportunity with the introduction of new guidance (and a new processing fee) to clarify responsibilities and ensure that processes are pragmatic and able to mitigate archive capacity issues. We would welcome further discussion of these issues to identify opportunities.”*

5.1.2 Technical or language specific amendments

- i. *“Section 2.2 mentions disposal strategies – these are not widely used in Scotland due to the existing law.”*
- ii. *“Section 2.2 references ‘collection and disposal strategies’, is there a need for retention strategies as well?”*
- iii. *“Few current documents refer to ‘Fieldwork, Excavation and Recovery’, this is usually understood to be the data-gathering stage of a project. ‘On Site’ might be a more succinct way of putting it.”*
- iv. *“Section 2.1 Not all assemblages are excavated but ‘excavation or recovery’ is vague. In any case, isn’t excavation a means of recovery, not an alternative to it? Perhaps this? ‘...undertaking a project that results in the recovery of a finds assemblage...’”*
- v. *“Section 2.2 ‘Disposal strategy’ is an outmoded term. See the CfA Selection Toolkit.”*

5.1.3 Additional clarification required

- i. *“Under Section 2.3, the time limit of 5 years for submission to TT is really welcome, I wonder if a qualifying statement about this having to happen even if there is possibility of further phases of work would be helpful?”*
- ii. *“Section 2.3 - 5 year after completion of fieldwork applies to most sites but large complex sites may inevitably take longer, particularly if a number of specialists are involved in analysis of the material.”*
- iii. *“Could it please be clarified that it will be reported to TT whichever is soonest after post-excavation work has been completed OR within five years of completion of fieldwork as otherwise post ex could last forever?”*
- iv. *“I’m assuming that Section 2.3 ‘after post-excavation work has been completed OR within five years of completion of fieldwork.’ means 5 years maximum?”*

- v. *“There is no reference to the application of a selection strategy during fieldwork, where some finds can be recorded on site and not collected for removal to post-fieldwork assessment or analysis.”*
- vi. *“This section is vague throughout: - what is 'a coherent excavation recording system' and what if the project is not an excavation?”*
- vii. *“How should finds be 'systematically documented'? Presumably to characterize material types and quantify the amounts present in each contextual unit?”*
- viii. *“What are 'the required technical standards'? Links to current standards, such as the 'Standard for Pottery Studies in Archaeology' might help?”*
- ix. *“There is nothing about cleaning or marking/labelling, which usually take place during data-gathering.”*
- x. *“Section 2.2 says that written schemes of investigation should “reference collection and disposal strategies” but there is no further discussion of selection strategies in the document. It would be helpful if principles and expectations around selection/disposal could be clarified, including in relation to Treasure Trove and allocation processes which are briefly outlined at 4.2. If possible, reference to ClfA’s Selection Toolkit should be included.”*
- xi. *“Section 2.3 TT reporting: also include statement of significance at this stage, when it would be most useful to inform potential bidders.”*

5.2 Consultation Discussion on comments or proposed amendments to Section 2 of the Guidance

5.2.1 General Comments

Overall, the comments are encouraging, however there are two issues which will require further discussion and clarification. The first is tackling the perception that introducing minimum standards does not meet the tests under current planning legislation (and indeed a consideration also as part of a

separate discussion for the introduction of a processing fee). Given that the majority of commercial units, for instance, already pack and transfer assemblages to a specification they have each created, the standardisation of such an approach across the sector would seem to be a fairer system than the one currently in operation. By default, this new standard would also then be aligned to the spirit of the planning legislation tests which require precision and fairness. It should also be noted that no specific Condition is envisaged at this stage for implementing these standards within the developer-led process, but rather the work would form part of the expected ‘programme of archaeological works’, and referred to within the Written Scheme of Investigation as well as any Post-Excavation Research Design if applicable.

The second issue is the question of whether an assemblage can gain provisional claim status from Treasure Trove. Technically all assemblages by default are claimed under Treasure Trove, the question instead being whether any museum subsequently bids to accept them under the allocation process. Setting that aside, the thrust of the comment concerns costs incurred. Under the current system if an assemblage is not bid for by a museum, costs will have been potentially incurred which needn't have been. Conversely, if an assumption is made that an assemblage is going to be disclaimed, but is then subsequently allocated, then additional costs are incurred as no budget exists for meeting the required standards. The practicalities of whether the TT process can be refined or not is a separate matter outwith the scope of this project. However, until those discussions have taken place and a solution agreed, the project team recognise that it would be inappropriate to introduce new minimum standards.

Discussions should also consider opportunities for improving sustainable selection practices around assemblages before they are considered in the TT process. This mirrors the recommendations contained within *‘Implementation of a ‘Processing Fee’ by Museums within developer-led archaeology for*

accessioning the physical element of archaeological archives in Scotland – A Consultation Report’ (Mann, 2021).

Recommend that a working group, representative of the sector, is established with the Treasure Trove Unit to examine and resolve these issues over when assemblages can be claimed or not, and what should or should not be retained as part of the assemblage.

5.2.2 **Technical or language specific amendments**

Recommend accepting suggested changes specified in this report:

Section 5.1.2 i, iii, iv, v

Recommend rejecting suggested changes specified in this report:

Section 5.1.2 ii – Retention would be what you were left with following any disposal, so thereby a separate strategy would be redundant.

5.2.3 **Additional clarification required**

Recommend discussion with Treasure Trove Unit and creation of clear statement on timescales in order to address comment specified in this report:

Section 5.1.3 i, ii, iii, iv

Recommend insertion of a paragraph explaining selection strategies in Scotland, following on from discussions with Treasure Trove Unit and ClfA in relation to the ClfA ‘Selection Toolkit’. This would address comments specified in this report:

Section 5.1.3 v, vi, x

Recommend expanding text to better define meaning and steps involved in order to address comments specified in this report:

Section 5.1.3 vii, ix

Recommend accepting suggested changes specified in this report:

Section 5.1.3 viii, xi

6 Guidance Section 3 ‘Conservation, Post-excavation, and Packing’

6.1 Consultation feedback: comments or proposed amendments to Section 3 of the Guidance

In total, 1 respondent provided no response at all to this question, 4 confirmed no amendments were required, and 14 provided comments. These comments have been grouped below according to common theme. Note that some of the respondents gave responses that have been split between the groups. ‘Section’ references within quoted comments refer to the draft standards consulted on, while ‘Section’ references not within quoted comments refer to sections within this consultation report.

6.1.1 General Comments

- i. *“Section 3.3 – While understanding it needs to wait until any necessary analysis has been done, and not prevent any future analysis, conservation for future transfer to museum should not be left until last minute when further deterioration may have taken place.”*
- ii. *“All references to labelling and numbering systems and their accord with documentation and finds lists – essential great care is taken, including recheck at time of allocation to museum (5.2).”*
- iii. *“I have concerns for Community groups and individuals regarding the costs of funding for appropriate boxes and packaging material.”*
- iv. *“With regard to materials for any packing replacements, this is likely exasperated by the archaeological contractor not knowing where or if an assemblage is to be allocated. There will always be specific requirements that cannot be met because this is not known when the post-excavation fees are agreed with the developer client.”*

- v. *“Images of ‘how to’ would be useful for smaller units / community projects. Also, perhaps we need to consider emergency protocol if this guidance falls through.”*
- vi. *“It is up to the museums to standardise. Even as a small unit working in a fairly restricted area, we have deposited with four different museums.”*
- vii. *“Professional conservation advice not available in all rural areas or areas outwith Central Belt.”*
- viii. *“Museums more likely to have access to x-ray facilities.”*
- ix. *“This section is a useful guideline but difficult to implement for all assemblages.”*
- x. *“This whole section seems to be muddled between immediate off-site conservation / cleaning / storage requirements (is that really the remit of this document?), medium-term storage with an archaeological contractor, museum-ready conservation / packaging mixed in with the accompanying paper / digital records requirements, and delivery. This makes it confusing to read, difficult to find relevant information, and they need to be more clearly separated into stages.”*
- xi. *“Excellent and we can't wait to get our first correctly boxed, packaged and labelled assemblage.”*
- xii. *“There's quite a mix of specific and general in this section. Our conservators suggest it would be best to mention general principles here, and pull some of the specific details in an appendix. The basic structure seems OK, but shift detail around. Principles would explain: the need to use conservation-grade packaging, which is inert and thus doesn't damage the objects; the use of silica gel for controlling humidity, when used in a sealed container; the need for clear labelling in archive-stable materials, with permanent marker. If silica gel is mentioned, need to mention also health & safety aspects over its use if it is used loose rather than bagged; also need to make sure that it's conditioned to the correct humidity.”*

6.1.2 Technical or language specific amendments

- i. *“Section 3.3 - UKIC no longer exists.”*
- ii. *“Sections 3.4, 3.5. & 3.6 - Packing methods very prescriptive, great as a guideline but might be better as a generic statement such as all finds should be adequately packed, physically supported and protected using conservation grade materials.”*
- iii. *“Section 3.8.1 - Cleaning not always necessary e.g. metals.”*
- iv. *“Section 3.8.5 - X Ray of all metals (excluding lead) is best practice. In reality oversized objects and those that are identifiably modern do not usually undergo X Ray unless specifically required e.g. Viking Sword. Choices on priorities for X Ray may be necessary in the case of very large assemblages.”*
- v. *“Section 3.8.6 - Active conservation not always required to ensure artefact is stable.”*
- vi. *“Section 3.8.3 - Labels can get rubbed off so useful to also have an internal tag.”*
- vii. *“Section 3.8.8 - Very detailed and will not always be possible to include all info e.g. date of recovery of find not always recorded. Much information repeated elsewhere e.g. catalogue dimensions.”*
- viii. *“Section 3.1 – records of “reduced or reorganised” or any conservation – CHANGE TO essential.”*
- ix. *“Section 3.4 - mention that conservation grade pins should be used to secure foam 'braces'.”*
- x. *“Section 3.8.8 - a finds list is critical for correct accessioning and is so often not included with assemblages - it is really helpful that this is specified, and I wonder if it should be highlighted as a MUST be included and that it MUST link back to the DRS or final publication. Some Units would call this a 'Finds Catalogue' - is it worth including this term in brackets? In my experience, the Finds List or Catalogue would typically be prepared during post excavation after disposal of material collected*

on site which then proved to not be archaeological - is it worth stressing that this must be the list of material that is coming to the museum and not what was found on site?"

- xi. "Section 3.9 should include a paper copy of the Finds List, and DSR and or publication relating to the assemblage, and access (via cd, or link) to this and all other paper archive (specialist reports, conservation reports etc)."*
- xii. "Section 3.9.2 - An instruction should be included on clearly marking hazardous materials on boxes and associated paperwork (e.g. lead metal finds). This is standard industry practice in museums."*
- xiii. "Section 3.9.2 - Boxes should be labelled with a sequential numbering system which also includes the relevant site details."*
- xiv. "Section 3.9.4 - Re-phrasing to allow shared boxes where this is the most efficient use of space and doesn't compromise any conservation requirement – this helps with more efficient use of storage space, and when scaled up – impacts on climate change in terms of storage management, materials and energy consumption."*
- xv. "Section 3.8.9 – if it is intended as an exhaustive list then it should reference further ways in which remains may be deposited, for example vials of pollen residue (not just microscope slides) or resin impregnated blocks made for soil thin sections."*
- xvi. "We note that SMA advice (SMA Materials Fact Sheet: Collections Packaging & Silica gel) notes that not all permanent black markers are appropriate for archive use (with some not having the necessary longevity). Some reference in 3.8.3 to ensuring that permanent marker pens are suitable would be helpful."*
- xvii. "Paragraph 3.8.8 would be clearer if it read 'Finds Lists (digital spreadsheet version) should detail: ...'. If another meaning is intended then rephrase."*

- xviii. *“Section 3.1 - ‘and any necessary material assessed by a qualified conservator where appropriate’”*
- xix. *“Section 3.1 - ‘minimal conservation at this stage to stabilise and identify artefacts’ would be better as ‘conservation sufficient to stabilise and identify artefacts at this stage’”*
- xx. *“Section 3.3 - ‘adequately labelled’ is too weak – cross-reference to 3.8.3-4 or bring that info in here.”*
- xxi. *“Packing and labelling - at the moment there is some duplication, as this appears in 3.4-3.6, 3.8.2 (detail of bags), 3.8.3-4 (detail of labelling), and again in 3.9.1-3. It would be clearer to restructure this slightly, or to pull all the detail into a single appendix; perhaps part of appendix 2?”*
- xxii. *“Packing - why not give full list of common / trade names – jiffy is mentioned but not plasztazote, correx, foamex etc - and some useful materials are not listed at all – e.g. Tyvek. This again would fit best in an appendix.”*
- xxiii. *“Section 3.4 - bit about making sure an object is visible through plastic bag / crystal box is very specific – and not necessarily correct - better to have objects well packed and labelled, especially for transit. Packing can be removed on arrival to allow objects to be seen.”*
- xxiv. *“Section 3.4 - if this level of detail remains, should mention silica gel for metal items here as well as in 3.5.”*
- xxv. *“Section 3.4 - rather than wet strength repair tissue, specify acid-free tissue.”*
- xxvi. *“Section 3.5 – ‘Packaged metal objects should be boxed in *air-tight* polythene boxes’”*
- xxvii. *“Between Sections 3.5 and 3.6 add reference to packing of human remains (Society for Museum Archaeology Material Factsheet; referred to in Section 7, additional resources).”*
- xxviii. *“Section 3.6 - suggested modification of ‘It may be appropriate to directly mark the details onto an object in this instance.’ to ‘If a label cannot be*

securely attached, it may be appropriate to mark the details directly onto an object. This should be done subtly on a discreet area, with a layer of reversible adhesive applied first to take the number.’ This is needed to avoid the numbering damaging the object, but it comes with H&S implications. We use Paraloid B72 in 20-25% acetone as both undercoat and overcoat; but this is best mixed by a conservator, and needs to be stored and handled under COSHH guidelines.”

- xxix. *“Section 3.6 - this is the first reference to numbering of finds and packaging; as noted above, best either to make it explicit at 3.3 (where it just says ‘adequately labelled’) or cross-ref to 3.8.3-4 cover this enough?”*
- xxx. *“Section 3.8.1 - qualify ‘the only exceptions are’ with some examples e.g. assess first of all for residues / pigments; cleaning of moulds and crucibles should only be done after specialist assessment and any scientific analysis.”*
- xxxi. *“Section 3.8.1- perhaps as a separate line: refitting of fragments should be done by a conservator or under clear conservation advice (i.e. no sticking pots together with UHU).”*
- xxxii. *“Section 3.8.8 - Spreadsheets should not have blank rows.”*
- xxxiii. *“Section 3.8.9 needs to reference Appendix 1.”*
- xxxiv. *“Section 3.8.11 should read ‘using the appropriate form’”*
- xxxv. *“Section 3.9.1 - Specify grade of cardboard – needs to be a decent quality box. We suggest 1900 ULC. Ditto with plastazote, if used – should be LD18.”*
- xxxvi. *“Section 3.9.3 - it would be desirable to specify preferred box sizes. Typically this would be a cuboidal box for general finds, “skull boxes” for pots, larger ones for urns. Stress need to use clean boxes of same size.”*
- xxxvii. *“Section 3.9.5 - split this into two, to avoid the unintended implication that iron should not be treated.”*
- xxxviii. *“Section 3.9.8 - repetition of points above?”*

6.1.3 Additional clarification required

- i. *“Section 3.8.9 - Unprocessed bulk soil samples – a particular source of historic problems. Clarity needed over when/if they can be discarded - and also for processed samples. Need for national/regional storage if cannot be accommodated at the museum allocated the assemblage? Need for documentation of removal (and fate) if not retained – also in context of 4.1. Why are any samples taken but not processed? Contractor needs to resolve this, and no unprocessed bulk samples should form part of an assemblage. Either the sample has been taken with the purpose of being processed or don't take the sample. Make it as simple as possible. Residue from processed samples (ecofacts) is a different conversation – as these we would consider to be part of the assemblage , e.g. if it is the remains of foods, industrial practices, bone fragments, these should be treated the same as any other artefact, as in telling the story but also offering an opportunity for further study down the line e.g. as & when new techniques evolve or understanding changes – but need to be stabilised for storage.”*
- ii. *“Section 3.1 - it be helpful to add a sentence to state that material recovered during excavation (i.e. stone that later proved to be unworked, modern day ' rubbish' etc.) should be disposed of before the archive is submitted for allocation.”*
- iii. *“Specification of packaging is fine in principle. However, after an internet search we found it hard to identify exactly what fell within the specification. At the very least a list of approved suppliers should be made available.”*
- iv. *“I would suggest that there needs to be a clear statement that all finds must be washed and marked as appropriate.”*
- v. *“Integration with data standards e.g. Section 3.8.8 would be useful.”*
- vi. *“There is a problem in this section of potential confusion being caused by lack of detail or definitions. Terms like 'moderately robust' are not helpful*

without examples; what are 'larger' metal objects; what is an 'archive-standard label'?"

- vii. *“Some additional clarity is required in relation to the storage of wet organic remains. Currently paragraph 3.7 explores references to temporary cold storage for wet (presumably unconserved) remains. It would perhaps be useful to specify examples of conservation processes for these types of remains and specify acceptable long term storage strategies. Additionally, clarity could also be improved by ensuring that it is not implied that all organic materials need to be kept wet while in temporary storage and that materials requiring ‘chilled’ conditions may refer to conditions which are cooler than normal recommended archaeological store conditions, signposting technical guidelines if these exist.”*
- viii. *“There is some potential for examples to be included. Section 3.8.1, for instance, could include residue analysis as an example of where cleaning could destroy scientific evidence.”*
- ix. *“Explanation or signposting to standards for ‘archive quality digital files’ should be included at Section 3.8.7.”*
- x. *“Clarity would be helpful in Section 3.9.12 as to whether storage locations refer to locations within a single site / repository or different sites (e.g. external specialist laboratories). If the latter, should concerns arising for accessibility or additional risks to the long-term dispersal of the archive (counter to stated desirability to allocate entire assemblages to a single museum) be highlighted?”*
- xi. *“Section 3.8.7 - what is archive quality? Can we refer to HES standards for archive deposition? Should specify acceptable file type(s) and how they should be named. Strong preference for either naming the files with site code, small find no, running number, or including a spreadsheet concordance that links original file names to finds numbers.”*

6.2 Consultation Discussion on comments or proposed amendments to Section 3 of the Guidance

6.2.1 General Comments

Recommend that wording is added to the document to encourage following the minimum standards at each stage the process of dealing with archaeological assemblages, rather than leaving tasks to the last minute and thereby, for example, increasing the risk of an assemblage deteriorating, or numbering becoming out of sequence.

The questions raised about how these standards will impact on community groups and individuals echo comments made in relation to other proposed changes around how we treat new discoveries. On the one hand the costs of meeting these minimum standards will be beyond what many groups will plan for when fundraising, but on the other hand how an assemblage is treated should not be reliant on luck as to who finds it in the first instance. There is a wider sector discussion to be had over how to better inform and prepare non-commercial groups, including universities, in planning for these costs before embarking on fieldwork projects. This is further picked up in the comment suggesting the inclusion of 'how to' images to help guide people when following these standards, and to introduce an emergency protocol for assemblages that don't meet the standard.

Recommend that a cross sector working group is established with a particular emphasis on community archaeology to discuss these issues, and develop supporting resources to help implement the minimum standards.

Furthermore, the response which noted concerns around not knowing where or if an assemblage is to be allocated relates to concerns raised in Section 5.2.1 (above), and as such will also be addressed under the same recommendation outlined at the end of that section.

Several comments referred to difficulties in accessing conservation advice or appropriate facilities outwith the central belt region. Interestingly, different parts of the sector mistakenly believe that other parts have better access to such resources, a reflection perhaps of individual experiences and misconceptions of what is available.

Recommend that a list of facilities, with their locations, and conservators is created for easy reference to those seeking their input.

Finally, two responses refer to the “*mix of specific and general*” in this section, and that the “*whole section seems to be muddled*”. These are fair comments to make and to address this:

Recommend that the entire document is reviewed and reordered in order to make it more understandable and easier to navigate.

6.2.2 Technical or language specific amendments

Recommend accepting suggested changes specified in this report:

Section 6.1.2 i, ii, iv, v, vi, vii, viii, ix, x, xii, xiii, xiv, xvi, xvii, xviii, xix, xx, xxi, xxii, xxiii, xxiv, xxvi, xxvii, xxix, xxx, xxxi, xxxii, xxxiii, xxxiv, xxxvii, xxxviii

Section 6.1.2 xv – further stakeholder discussion will be required to properly populate this list.

Section 6.1.2 xxv – This will need further clarification.

Section 6.1.2 xxviii – Given the potential H&S implications this will need further discussion, including whether achievable outwith a museum setting.

Section 6.1.2 xxxv – This will need further clarification.

Section 6.1.2 xxxvi - This will need further stakeholder discussion over whether specifics can be agreed or not.

Recommend rejecting suggested changes specified in this report:

Section 6.1.2 iii – instead of removing reference to cleaning, this section to be caveated and reference made to seeking conservator advice.

Section 6.1.2 xi – paper copies rarely exist now within a site archive and digital storage formats such as CD-Rom are already outdated with new computers not having disk drives as standard to read them.

Clarification over how to access this information should however be included.

6.2.3 **Additional clarification required**

Recommend sector-wide discussion on the issue of ecofactual samples, what should or should not be retained, and wording added to the guidance document to bring absolute clarity to the issue in order to address comment specified in this report:

Section 6.1.3 i

Recommend adding sentence as suggested, with caveat of some materials (e.g. unworked quartz pebbles from a Bronze Age site) can be a key part of the site assemblage. Wording will need to be agreed with Treasure Trove Unit, and will address comment specified in this report:

Section 6.1.3 ii

Recommend developing an ad hoc list of packaging suppliers to aid those seeking to purchase suitable materials. No particular company should be recommended, but a flexible ad hoc list can be maintained without infringing procurement rules. This would address issue specified in this report:

Section 6.1.3 iii

Recommend accepting suggested changes specified in this report:

Section 6.1.3 iv (with caveats), v, vi, vii, viii, ix, x, xi

7 Guidance Section 4 ‘Reporting and Allocation’

7.1 Consultation feedback: comments or proposed amendments to Section 4 of the Guidance

In total, 2 respondents provided no response at all to this question, 3 confirmed no amendments were required, and 14 provided comments. These comments have been grouped below according to common theme. Note that some of the respondents gave responses that have been split between the groups. ‘Section’ references within quoted comments refer to the draft standards consulted on, while ‘Section’ references not within quoted comments refer to sections within this consultation report.

7.1.1 General Comments

- i. *“Documentation to accompany the assemblage might refer to section header.”*
- ii. *“I would note that we would not normally seek to acquire items which have not been claimed by the Crown unless they have an accompanying “non-claimed” certificate to prove its status. I would like the process to include these certificates as standard practice. TTU may have this as a policy, but it should be included here as well?”*
- iii. *“Reference to the processing fee should also be made in this section? A museum would want to know the attached fee as part of their decision-making process before bidding.”*
- iv. *“The very long delays in SAFAP allocation cause problems with the storage and curation of assemblages.”*
- v. *“Refer readers to the TTU code of practice.”*
- vi. *“Arrangement of appropriate insurance should be referenced here or in Section 5.”*
- vii. *“All excellent.”*

- viii. *“It will be extremely useful for the TT allocation reference number to be quoted in any assemblage paperwork / documentation.”*
- ix. *“Section 4.2 - One key issue here is ensuring there’s no human remains in the assemblage that is returned – this perhaps needs specifically flagged in the TT process, and reference to appropriate disposal mechanisms.”*

7.1.2 Technical or language specific amendments

- i. *“Section 4.2 is at odds with the TTU code of practice.”*
- ii. *“Section 4.4 - Treasure Trove allocate the reference number at a much earlier stage - before the assemblage is allocated, not after.”*
- iii. *“Section 4 - 'Statement of Significance' should be submitted to TT for consultation by museums before they bid for material.”*
- iv. *“Section 4 - Statement of significance: add reference to Appendices 4-5.”*
- v. *“Section 4.2 - Should read ‘Museums Galleries Scotland’”*
- vi. *“Section 4.4 - add that the assemblage remains with the excavator during the allocation process.”*

7.1.3 Additional clarification required

- i. *“Section 4.2 - What of the fee if the assemblage is not claimed - can it be used to find an alternative recipient? A standard fee would allow deposition to an alternative museum.”*
- ii. *“Section 4.1, .2, .4 Reporting for HERs and SMRs – can a mechanism be incorporated for relaying information to local authority archaeologists on allocation AND also disclaiming of archive by TTU? Local authorities could register their interest. Is the data recorded by TTU in an easily disseminated form?”*
- iii. *“With regard to making suitable provision for archive deposition, the issue here is that archaeological contractors do not know where an*

archive is going to be deposited. This is due to how the allocation process is communicated between both commercial and museum sectors. This includes not knowing if it is actually going to be allocated at all, and may end up back with the contractor for ethical deposition. Has the fee already been paid at that point or budgeted in? What happens to it if it is disclaimed?”

- iv. *“Section 4.2 - If the Crown haven't claimed assemblage or no museums have expressed an interest in material - this seems a very grey area. One positive approach would be to allow such material to be deposited with a school near the findspot for education / object handling. In this instance such objects would need to be accompanied by a simple explanation of where they were found and what they are (not a standard excavation report).”*
- v. *“There needs to be some definition of what is meant at Section 4.2 by ‘ethical manner’ when disposal of unclaimed finds by a contractor is discussed.”*
- vi. *“What is ‘ethical disposal’?”*
- vii. *“Section 4.2 - define ‘ethical manner’.”*
- viii. *“General query from BLANK re insurance status – is there a process by which valuations can be provided for assemblages so that appropriate insurance can be arranged for the transfer of the material and its storage by the receiving museum? In the case of legacy material held by institutions but not yet processed through TT, are TTU or the QLTR as the owners of the material able to provide indicative valuations of assemblages which can be used for insurance purposes?”*
- ix. *“Section 4.2 I'm not really experienced in the system in Scotland, but if no museum bids for an assemblage, how easy would it be for a contractor to find one themselves? How does one dispose of an assemblage in an ‘ethical manner’? Some guidance on this would surely be helpful?”*

- x. *“It is helpful that expectations surrounding the documentary archive and submission to NRHE is mentioned at 4.1 and 4.3, although signposting in the introduction may also be useful. It may also be helpful to clarify information relating to digital archives, which are not mentioned in this section.”*
- xi. *“Section 4.2 - The treatment of unclaimed material begins to sound like a second allocation process! It may need rephrased / simplified. Line two, replace “no museum” with “no accredited museum”. Perhaps rephrase next part as “...offered promptly to a local non-accredited museum, heritage centre or community group....”*
- xii. *“Section 4.2 - what is “an ethical manner” here? Are there codes of ethics or guidance to be signposted here? We couldn’t think of any, but surely something? At this point, it’s the excavator’s to dispose of; in almost every case it will be post-Medieval, and likely to be of limited interest to most museums.”*

7.2 Consultation Discussion on comments or proposed amendments to Section 4 of the Guidance

7.2.1 General Comments

Responses received in relation to this section were largely ones of technical clarification. For those relating to the wider process of information sharing around the Treasure Trove process, i.e. ‘non-claimed certificates’ and ‘allocation reference numbers’, these should be highlighted within a process flowchart with appropriate dissemination and training to all relevant stakeholders.

Recommend developing a process flowchart highlighting key milestones, core documents, roles and responsibilities associated with each stage of reporting and allocating an archaeological assemblage.

This flowchart will need to be developed in conjunction with the Treasure Trove Unit in the first instance (see also communication roles as detailed in Section 7.2.3) to address comments specified in this report:

Section 7.1.1 ii, iv,

Recommend making suggested changes to address comments specified in this report:

Section 7.1.1 i, iii, v, vi, viii, ix

7.2.2 **Technical or language specific amendments**

Recommend accepting suggested changes specified in this report:

Section 7.1.2 i, ii, iii, iv, v, vi

Recommend rejecting suggested changes specified in this report:

There were no suggested changes which were recommended for rejection.

7.2.3 **Additional clarification required**

The responses relating to whether a standard fee would allow deposition to an alternative museum relates to the parallel consultation undertaken on feasibility of implementing a museum processing fee for assemblages. This consideration of how such a fee could be used for funding ethical disposal is covered within the recommendations of that report (see *'Implementation of a Processing Fee' by Museums within developer-led archaeology for accessioning the physical element of archaeological archives in Scotland – 2021 Consultation Report*). However, the definition of what is meant by 'ethical' is lacking within both documents.

Recommend establishing a short-lived working group with sector-wide representation to create a definition for ‘ethical’ within the context of assemblage disposal, and adding the agreed definition to the guidance in order to address comments specified in this report:

Section 7.1.3 i, iii, iv, v, vi, vii, , ix, xi, xii

One response raised the query of whether a mechanism can be developed for informing local authority archaeology services about whether an assemblage has been allocated (and if so where to) or whether it has been dis-claimed (and if so where the assemblage has been disposed to). Details of the archive location form part of the OASIS online reporting mechanism (<https://oasis.ac.uk/>), however, how successful this is for disseminating this particular information requirement needs to be investigated further. At the heart of this, as with many of the issues raised throughout the consultation, lies the need for improved communication between all key stakeholders.

Recommend adding communication roles and responsibilities as part of the work to be undertaken for the process flowchart identified in Section 7.2.1 to address comment specified in this report:

Section 7.1.3 ii

One response also raised the issue of how to value assemblages for insurance purposes, including those which are legacy material not yet processed through Treasure Trove.

Recommend seeking a definitive answer to issues of valuation from the Treasure Trove Unit, and creating a short ‘how to’ guidance document for use within the sector to address issue specified in this report:

Section 7.1.3 viii

Recommend accepting suggested changes specified in this report:

Section 7.1.3 x

8 Guidance Section 5 ‘Transfer to museum after allocation’

8.1 Consultation feedback: comments or proposed amendments to Section 5 of the Guidance

In total, 2 respondents provided no response at all to this question, 4 confirmed no amendments were required, and 13 provided comments. These comments have been grouped below according to common theme. Note that some of the respondents gave responses that have been split between the groups. ‘Section’ references within quoted comments refer to the draft standards consulted on, while ‘Section’ references not within quoted comments refer to sections within this consultation report.

8.1.1 General Comments

- i. *“Section 5.3 - Statement of significance and potential is very subjective. Likely to be internal consistency within organisations but variable across the board.”*
- ii. *“Section 5.3.8 - Future requirements for conservation very subjective if not only based on storage. Usually covered in the conservation report and specific to each project. Very detailed form to fill in for each assemblage and could take quite a bit of time.”*
- iii. *“Section 5.3.10 Some concern about how subjective this process will be. Also incredibly detailed (assessment values of part 3 & 4) and will take a lot of time if we are understanding this correctly. See no merit in filling out form for every single object / bag of objects and would be inviable timewise? More info about what data is to be used for might help with understanding process and requirements.”*
- iv. *“I have reservations about the mechanism for payment of the processing fee.”*
- v. *“ORGANISATION BLANK is very concerned by the statement in Section 4.2... that ownership goes to the finder (excavator) if disclaimed or*

claimed and not bid on. We do not know the legal basis for this statement. We consider that it more likely reverts to the landowner or failing that to the excavator's Client."

- vi. "These documents are silent (not even cross-referencing other guidance) on the thorny issue of human skeletal material that does commonly make up part of assemblage. They do touch upon ecofactual material and soil samples quite late on, but do not address ownership of this material and on what legal basis it is being accessioned into the Museum."*
- vii. "Underpinning all of this material needs to be a review or recommended approach as to how archaeological companies secure title to soil samples, ecofactual material and disclaimed artefacts through prior agreement so that their position to act in depositing material is secure."*
- viii. "This section outlines what is a significant increase in documentation to be provided by the archaeological contractor. There will be time and cost implications to contractors to be able to prepare assemblages to these standards, costs which may not be built into projects which are already ongoing."*
- ix. "Section 5.3.10 - is the Statement of Significance currently in general use? It seems quite a task to complete, and asks if it has been agreed with relevant LAA which is also a big ask on them at a time when resources are stretched."*
- x. "Section 5.2 – It would be useful if the excavator could make recommendations on disposal. It would be useful if they could advise (for example) 'X type of pottery is well represented in the archaeological record, this box contains only undecorated fragmentary pieces and could be considered for disposal.' A lot of museums are reluctant to dispose of material because they don't necessarily have the staff expertise to assess its significance and make judgement."*

- xi. “All excellent but could the paperwork be forwarded to the museums in advance of the assemblage arriving so that staff can learn more about what is arriving and can prepare accordingly?”*

8.1.2 Technical or language specific amendments

- i. “Section 5.7 - To be welcomed. Suggest timeframe of 12-18 months.”*
- ii. “Section 5.7 - Good point that a signed receipt shouldn’t indicate the museum has accepted the assemblage as meeting the standard until after a reasonable time to make an assessment. A named contact for the depositor would be helpful. Time period (?28 days) for initial assessment? Otherwise how long is a bit of string, things deteriorate further, how do you then prove who is at fault for deterioration – it needs an end date to be agree rather than “reasonable time”.*
- iii. “‘Museums will’ INSERT ‘may’ (or ‘have the right to’) only accept assemblages which meet the requirements set out in the rest of this document.”*
- iv. “Section 5.1 It might be helpful to again stress the time limit of 5 years after field work ends here?”*
- v. “Section 5.3 - Emphasise the Finds List as a MUST include, as well as DSR and or publication relating to the assemblage, and access (via cd, or link) to this and all other paper archive (specialist reports, conservation reports etc). I note it is included, but not quite clear enough.”*
- vi. “Digital records - There should be some responsibility to museum to download digital records on receipt. Digital storage changes quickly (for example CDs, or who can now read microfiche).”*
- vii. “Section 5.3.9 – Unrealistic, important material can be revisited long after main excavation publication completed.”*

- viii. *“Interesting to see link to HES Statement of Significance on page 25 but it would be better to link to <https://www.historicenvironment.scot/sos> which links to the inventory of all the statements, just in case the Jedburgh URL changes.”*
- ix. *“Reference should be made to the need to deposit paper/digital archives with NRHE ahead of or at the same time as the assemblage is deposited with the museum in order to avoid lag times where this information is not accessible.”*
- x. *“Section 5.1 – if the assemblage is not complete for any reason it needs to be drawn to the attention of the museum in advance of transfer, not on arrival at the museum.”*
- xi. *“Section 5.8 – Phrasing appears to give the excavator unrestricted rights to limit access to IP if they desire – this point should encourage an industry approach that recognises that excavators should look to assign a licence for all uses (including commercial and sub-licencing), but retain the right to be credited and acknowledged.”*
- xii. *“Section 5.3 - This list is not very well structured and is difficult to follow. It could be divided into physical and digital documentation? Or is it all meant to be digital? If so, I trust there is a requirement for these documents to be included in the documentary archive, because museums should not be attempting to curate digital material. It could also be divided into different types of information - indexes, reports, lists, graphic material?”*
- xiii. *“Section 5.3.2 - Digital copies of photographs? These days surely photographs are born digital, so copies would already be in digital form? Or is it required to scan slides or prints to digitize them? And the drawings and other types of illustration? Perhaps the reasons for that could be explained?”*
- xiv. *“Section 5.3.3 - Re-phrase? This seems to be a requirement to include all small finds and special finds in every photograph.”*

- xv. *“Section 5.1 - split this into three points, at ‘If for any reason the assemblage is incomplete’ and ‘All costs of transfer’”*
- xvi. *“Section 5.1 – ‘The archaeological organisation and museum ... timetable for transfer check the material’. Instead something that suggests both parties need to agree the transportation standards / method and timing of this, e.g.: ‘Within six months of allocation, the archaeological organisation and receiving museum should agree a timetable for completing the transfer documentation, the dates for the physical transfer, and the method and standards of transportation to be used’.”*
- xvii. *“Section 5.1 – ‘All costs of transfer are to be met by the depositor’. This should also include a mention of the need for discussion between the archaeological organisation and receiving museum (or specialist in the case of post-ex) about insurance / indemnity / risk, so that all parties know what will happen if things go wrong. Unit will need to cover any additional cost / provide additional conservation resource if damage occurs. They will need to think whether they absorb this cost or insure for it.”*
- xviii. *“Section 5.1 – transfer should specify a timescale.”*
- xix. *“Section 5.2 - Given that a lot of the documentary material will be digital, should it be specified that the accompanying documentation should arrive with or prior to the arrival of the assemblage, so it is available for when the objects arrive on site?”*
- xx. *“Section 5.2 – ‘This will include a Statement of Significance and Potential [DELETE which only needs to be a brief synopsis or paragraph] outlining the importance (or otherwise) of the site and its finds (see [DELETE ‘associated template’] Appendices 4-5).” – this should move to Section 4.”*
- xxi. *“Section 5.3.3 - Maybe photographs of ‘all significant’ finds would be a better form of wording. These also act as records of the object’s*

condition when sent to the museum, so the museum will judge against this whether the item has been damaged in transit.”

- xxii. *“Section 5.3.6 - Also abbreviations and a key to any colour coding in spreadsheets, etc.”*
- xxiii. *“Section 5.3.8 - replace ‘template’ with ‘Appendix 6”*
- xxiv. *“Section 5.4 - need to specify a timetable, so that the unit’s liability is not open-ended. We suggest within six months (one year for large assemblages of >50 boxes).”*
- xxv. *“Section 5.5 needs to reference Appendix 1.”*
- xxvi. *“Section 5.6 - ‘At the same time as the transfer of the assemblage, the Museum Processing Fee (see separate guidance) must be paid’. Surely this should be prior to deposition/delivery?”*
- xxvii. *“Section 5.6 - Would read better if ‘non-acceptance’ changed to ‘refusal”*
- xxviii. *“Section 5.7 - Depositor, not donor organisation, is more consistent with rest of document.”*

8.1.3 Additional clarification required

- i. *“Section 5.1 - in the cases where assemblages are split between different receiving museums will 2 fees be required? WSI and post-excavation costings will generally make provision for only a single fee & delivery.”*
- ii. *“Section 5.3.7 - Many organisations don’t have access to digital X Ray facilities. Please clarify if digitising of X Ray plates is required as this an expensive process.”*
- iii. *“Section 5.4 - If assemblage is rejected and has to be resubmitted will another fee be charged?”*
- iv. *“A standard should be included on destructive sampling - consideration should be given to location of interventions for analysis and sampling –*

to be done with reference to future display and study to avoid diminishing the research and / or display value of the artefact.”

- v. *“Section 5.6 – Who will bear the costs if an assemblage has to be sent back as it is found not to be prepared to standard? Could reference be made to museums reserving the right to preliminarily check assemblages while still with the excavator, particularly large assemblages where the logistics of physically transferring the material are potentially prohibitive to sending the assemblage back if more work is required?”*
- vi. *“How will the standard be enforced? What if discrepancies are identified or the processing fee isn’t paid? Who will enforce? This isn’t clear and it would be useful if this could be clarified.”*
- vii. *“Section 5.4 - The receiving museum will retain the right to refuse to accept any assemblage that does not meet the expected standards. It is the responsibility of the depositor to rectify any lapse in standard, and to re-deliver the assemblage to the receiving museum at their own expense. There will always be specific requirements that cannot be met because this is not known when the post-excavation fees are agreed with the developer client. It is unfair to then place the financial burden on the depositor, who may then be unable to afford to submit the assemblage. What then?”*
- viii. *“Sections 5.1/5.2: the issue of retention policies needs clarified here, especially if any storage fee is payable on deposition. Retention policies in the field are separate from this, but are presumably documented in the DSR / published report. Retention policies in post-ex need to be clearly stated, based on specialist advice in post-ex, and applied before reporting to TTU – e.g. to avoid modern material being kept in the assemblage (unless it’s a significant part of the site story); to discard unworked stone; probably also burnt / fire-cracked stone. The fate of discarded material should be recorded in the finds spreadsheet.”*

- ix. *“Section 5.3.2 - In what file format? Could be in all sorts of weird and wonderful proprietary file formats. Need something that is useable now and in the long term. Perhaps HES best placed to specify?”*
- x. *“Section 5.3.2 - Make copyright / IPR a separate point. '(including any copyright or intellectual property right caveats)'. Caveats is the wrong term and this needs clarifying. Copyright information needs to be supplied. Will this lie with HES archives - are all rights passed on deposition? Or does it remain with the companies/freelance illustrators etc? Who holds the copyright in this situation is less important than having a contract in place with the copyright holder that permits usage. The ideal situation would be that the unit acquires copyright from its specialists; the unit passes copyright to HES on deposition; there is a standard agreement / licence that permits recipient museums to use material without charge. There is little point holding material we don't have permission to use, so this is a key issue to resolve.”*
- xi. *“Section 5.3.3 - Does file format need to be specified? Are there HES archive guidelines? Should define naming format, so file name includes site code and sf number, or a spreadsheet gives a concordance.”*
- xii. *“Section 5.3.7 - What file format(s)? HES guidelines?”*
- xiii. *“Section 5.3.9 - In what format(s)? Suggest digital, with hard copy of published report. What file format(s) acceptable for digital? HES guidelines on this?”*

8.2 Consultation Discussion on comments or proposed amendments to Section 5 of the Guidance

8.2.1 General Comments

Significant concerns have been raised over the complexity of the Statement of Significance Template, its subjective nature, and the resource implications it will have for those attempting to complete it. These are legitimate concerns which the project team acknowledge.

Recommend reviewing the Statement of Significance template and significantly simplifying it in order to address comments specified in this report:

Section 8.1.1 i, iii, ix

Concerns were also raised around the complexity of the Conservation Requirements Template if assessments were to be based on anything more than storage considerations. The intention behind the creation of this template was for it to be treated as an opportunity to highlight specific issues within the assemblage for consideration from a conservation perspective, not for all aspects of the assemblage to be included. Further work would be required to clarify the quantity or extent of archaeological assemblages which would require anything more than a light touch completion of the template, but a review of how successful this template is should be specifically targeted within a wider review of the guidance following formal adoption.

Recommend reviewing the guidance document and templates, in consultation with the sector, to establish how successful the implementation has been of the minimum standards, what issues have been encountered, and what changes – if any – are required. A suggested timetable for such a review would be one-year after formal implementation of the standards. This would address comment specified in this report:

Section 8.1.1 ii

The issue of default ownership of non-claimed or non-allocated assemblages is a legal technicality which requires further clarification within the guidance. Other comments also highlighted the confusion around ecofactual material and on what basis that material can be legally accessioned into a museum.

Recommend creating an agreed statement on ownership for all elements of an archaeological assemblage, and for each stage of the process, with the Treasure Trove Unit for including within the guidance to address comments specified in this report:

Section 8.1.1 v, vi, vii

Recommend making suggested changes to address comments specified in this report:

Section 8.1.1 vi, xi

One comment raises a general concern over the significant increase in documentation to be provided as part of meeting these standards. The recommendations above for reviewing and simplifying the templates, in particular the Statement of Significance, should reduce this concern. It should also be noted that these standards, once introduced, will only be for new projects from a sector-wide agreed start date only, and will not be applied retrospectively.

Another response suggests consideration of whether depositors could advise on what material within the assemblage could be disposed of upon transfer to the museum as *“a lot of museums...don’t necessarily have the staff expertise to assess its significance and make judgement.”* This forms part of a wider issue around initial selection of material on site, through to perceived worth of individual elements of a site assemblage which may be highly subjective. Further consideration of this should be included both in the recommendation under 5.2.1. and the recommendation included here:

Recommend that a working group, representative of the sector, is established with the Treasure Trove Unit to examine and resolve these issues over when assemblages can be claimed or not, and what should or should not be retained as part of the assemblage.

8.2.2 Technical or language specific amendments

Recommend accepting suggested changes specified in this report:

Section 8.1.2 i, ii, iii, iv, v, vi, vii, viii, ix, x (include reference to museum's which don't accept human remains), xi, xii, xiii, xiv, xv, xvi, xvii, xviii, xix, xxi, xxii, xxiii, xxiv, xxv, xxviii

Section 8.1.2 xx relates to the Statement of Significance and changes made here will need to reflect the wider revision of this template within the guidance.

Section 8.1.2 xxvi will need to have text which aligns with the guidance document produced for the Museum Processing Fee.

Recommend rejecting suggested changes specified in this report:

Section 8.1.2 xxvii – this is a minor language change suggestion, but it will be revisited at the text edit review prior to implementation.

8.2.3 Additional clarification required

Recommend discussion with FAME and Treasure Trove Unit to establish whether assemblages being split between two different museums happens, and if so to establish clear statement within this guidance and the Museum Processing Fee guidance on what happens within such situations in order to address comment specified in this report:

Section 8.1.3 i

Recommend discussing access issues to x-ray facilities further with the sector to establish actual costs, limitations and whether there is an identified requirement for digitising x-rays to address issue specified in this report:

Section 8.1.3 ii

Recommend that a statement is added to the Museum Processing Fee guidance that a single fee only is payable in relation to any single archaeological assemblage, to address comment specified in this report:

Section 8.1.3 iii, (and in part i)

Recommend accepting suggested changes and clarifications specified in this report:

Section 8.1.3 iv, v, ix, xi, xii, xiii

Section 8.1.3 vi to be clarified within the flowchart referred to within 7.2.1, and the Museum Processing Fee guidance document.

Section 8.1.3 viii to be clarified within the working group recommended within 5.2.1

Recommend establishing a working group with sector-wide representation (with particular emphasis on the commercial sector) to review the wording and intent of Section 5.4 of the Draft Standards with regard to dealing with unknown costs which emerge after post-excavation costs have been agreed, and the potential conflict this raises with meeting these standards. This will address issue specified in this report:

Section 8.1.3 vii

Recommend discussion with FAME, HES, MGS and representatives of the universities to clarify and agree wording over copyright and

intellectual property rights for inclusion in the Standards, and for use within wider documentation in the sector. This will address comment specified in this report:

Section 8.1.3 x

9 Guidance Appendices and Templates

9.1 Consultation feedback: comments on the draft templates

In total, 6 respondents provided no response at all to this question, 3 confirmed no amendments were required, and 10 provided comments. These comments have been grouped below each relevant template. Note that some of the respondents gave expanded responses that have been split between the templates. ‘Section’ references within quoted comments refer to the draft standards consulted on, while ‘Section’ references not within quoted comments refer to sections within this consultation report.

9.1.1 Appendix 1 – Processing Environmental Samples and Ecofacts

- i. *“The use of the word ‘processing’ in the title of Appendix 1 is potentially confusing, as it could lead to confusion with post-ex ‘processing’ of samples.”*
- ii. *“Reference to “sub-samples / grab samples” may need to be explained.”*
- iii. *“second paragraph mentions ‘failed site’. It would be useful for this to be explored in detail elsewhere – a failed site would not come with any funding, so who will pay for the conservation/packaging/assemblage paperwork preparation and museum processing fee?”*
- iv. *“Appendix 1 – first paragraph, the word is ‘floated’ or ‘flotated’ not ‘flotted’”*
- v. *“soil thin sections are not normally returned after analysis.”*

9.1.2 Template 2 – Summary of Packaging for Finds

- i. *“This may be the best place to list specific technical parameters of the various packing materials.”*
- ii. *“Table – acid free tissue is fine with metals; bubble wrap always needs barrier layer (e.g. Tyvek).”*

- iii. *“Modify ‘Amber / shale’ to ‘Amber / jet & shale’*
- iv. *“Change ‘Copper / silver alloy’ to ‘Copper alloy / silver/gold’ “*

9.1.3 Template 3 – Deposition Checklist

- i. *“Appendix 3 is not referred to anywhere in the document – what is its purpose and how does it fit into the process? Does the Packing List have to be sent twice (before deposition and with deposition as per section 5.1)?”*
- ii. *“Updated storage location list and specialist reports should be ‘mandatory if any’. Not all finds will have had specialist analysis.”*

9.1.4 Template 4 – Statement of Significance

- i. *“We strongly reject the proposed statement of significance template document (Appendix 4) and are opposed to its introduction in its current form. It is extremely onerous and we cannot see any reasonable justification for including parts 3-7. It has been lifted directly from the Collections Trust significance assessment grid, which is relevant to museums and their collections/collecting policies, but is not relevant to, and is far too complex and burdensome for, archaeological contractors. Section 5.2 refers to a ‘brief synopsis or paragraph’ for the statement of significance, which is the complete opposite of the onerous and extensive template provided in this document. A brief paragraph is already provided as part of the TTU notification, it is unclear why this wouldn’t be sufficient for the museums instead of the complex template proposed.”*
- ii. *“There should be space for the TT number on the template.”*
- iii. *“Part 1 – There is no space for adding depositor contact details.”*
- iv. *“Part 1 – the Excavation Details box is tiny, and surely it is enough to refer to the DSR accompanying the assemblage.”*
- v. *“Part 1 - What is the reason for the statement needing LAA agreement? This is the first time this has been mentioned anywhere and would be*

additional work for both the contractor and the LAA. It does not seem necessary given that the LAA will have already approved any grey literature and / or publication reports generated from the site, and the LAA has no involvement with museum collecting policies.”

- vi. *“Part 2 – Surely it is enough to just refer to the DSR accompanying the assemblage. The separation of period from material types in Part 3 means you cannot relate the material to the period (i.e. you could tick Neolithic, Iron Age and modern, then tick pottery, and you couldn’t then know if the pottery was Neolithic or not). The requirement for the site statement of significance is especially onerous and inappropriate, and we strongly reject its inclusion. The vast majority of sites will not have existing statements of significance - they are used only on HES properties in care, which are scheduled and some of the most important monuments in Scotland; they are not appropriate for the types of commercial projects conducted by archaeological contractors and it is ridiculous that this level of detail is expected.”*
- vii. *“Part 5 – synthetic research of the kind which allows for assessment of gaps in understanding is beyond the remit of archaeological contractors and should not be included. Some assemblages will also have had very little specialist work undertaken (remember that the scope of work is set by the LAA, not the contractor).”*
- viii. *“Part 6 – synthetic research of the kind which allows for the identification of associated sites / assemblages / archives is beyond the remit of archaeological contractors and should not be included. The contents of museum archives is, in any case, not publicly accessible.”*
- ix. *“An assemblage statement of significance is already prepared for the Statement of Significance section of the Treasure Trove notification form – why can this statement not be reused here?”*
- x. *“The request for judgements of significance in the categories outlined is too detailed and subject to biases within current understanding and*

research interests, both personal and within the wider field. We cannot see the justification for such a section. It has been lifted directly from the Collections Trust significance assessment grid, which is relevant to museums and their collections/collecting policies, but is not relevant to, and is far too complex and burdensome for, archaeological contractors. Archaeological contractors are usually not aware of any specific reasons for a museum choosing to bid for / retain an assemblage nor how it fits into their collecting policy, and what they may want to do with it in the future is not our responsibility. Surely it is more incumbent on the museum to ensure that the research and data that is deposited with the collection is easily accessible. If there are issues with accessibility of data then filling in additional forms such as the statement of significance document will not help with that situation.”

- xi. “The amount of work to put this template form together would significantly increase archaeological contractors’ per project archive time. If this is put in place, we will need sufficient notice to ensure this is covered through project costs. We can imagine there would be push-back from developers for the increased costs.”*
- xii. “To split the significance of an assemblage down into smaller and smaller categories, where each requests further information on a variety of levels, is particularly onerous and we are strongly opposed to this. It feels like it has been written by someone who does not understand what the bulk of development-led archaeology in Scotland typically produces in terms of finds assemblages and is focussed on what is ‘special’ or unusual.”*
- xiii. “Categories such as sensory / emotional impact and cultural meaning are irrelevant to the work of archaeological contractors and we are not qualified to make these sorts of judgements. Museums would need to run training sessions and provide much more detailed guidance / case studies on how and why to assess these values.”*

- xiv. *“It also needs to be remembered...that not all assemblages will undergo any post-excavation analysis / research before being notified to TTU / deposited with a museum, and the scope of work is set by the LAA, not the contractor.”*
- xv. *“There doesn’t seem to be much desire for this kind of data from the responses to the 2020 survey- only one museum suggested such a form and they wanted it for simplicity and to cut through jargon / specialist terminology - this form only increases the lack of clarity and increases the use of jargon and woolly concepts such as aesthetics.”*
- xvi. *“Statement of significance and potential is very subjective. Likely to be internal consistency within organisations but variable across the board. Also incredibly detailed (assessment values of part 3 & 4) and will take a lot of time if we are understanding this correctly. See no merit in filling out form for every single object/bag of objects and would be inviable timewise? More info about what data is to be used for might help with understanding process and requirements.”*
- xvii. *“ ‘This template is designed to help you draft a statement of significance for an assemblage prior to deposition with a museum.’ Is ‘you’ the archaeological contractor? Will contractors know the ins and outs of what is / isn't significant in each region? Our impression is that often TTU does not, for example and similarly nor does HES when listing / delisting buildings. And who is assessing rarity etc? Will there be consultation with the regional archaeologist or the likely receiving local museum?”*
- xviii. *“Museum accession no – how is this entered on this form? Does the museum give it to the contractor? Do you advise the museum to allocate an Accession Number rather than an Object Entry number at this stage?”*
- xix. *“Some contributors to this response questioned the proportionality of detailed statements of significance with documentary materials required*

to accompany the archive and questioned the extent to which the additional work by both LAAs and contractors is necessary.”

9.1.5 Template 5 – Guidance for Completing Statement of Significance

- i. “The section numbering in the guidance does not match the form, making it difficult to compare across the two documents.”*
- ii. “Introduction - The conservation principles outlined by Historic England refer to ‘Significance is a collective term for the sum of all the heritage values attached to a place, be it a building an archaeological site or a larger historic area such as a whole village or landscape’. They are clearly not intended to be used for objects and therefore are inappropriate. Likewise, the requirement for the site statement of significance is especially onerous and inappropriate, and we strongly reject its inclusion. The vast majority of sites will not have existing statements of significance - they are used only on HES properties in care, which are scheduled and some of the most important monuments in Scotland; they are not appropriate for the types of commercial projects conducted by archaeological contractors and the level of detail expected is unacceptable. The relevance of a study on carved stones to the majority of developer-funded projects is difficult to see; you are comparing apples to oranges. The UCL collections review was for museums to review existing collections and it is difficult to understand why the burden for this should be placed onto archaeological contractors – museums and archaeological contractors have very separate functions and remits.”*

9.1.6 Template 6 – Statement of Conservation Requirements

- i. “This seems fine.”*

9.2 Consultation Discussion on comments or proposed amendments to the Templates

9.2.1 Appendix 1 Discussion

Recommend accepting suggested changes / improvements specified in this report:

Section 9.1.1 i, ii, iv, v

Recommend establishing a short-lived working group with sector-wide representation to discuss this issue of ‘what if’ funding falls through, and create a step-by-step process for dealing with a ‘failed site’ which could then be referred to by these standards (and elsewhere within the sector as appropriate), which would address:

Section 9.1.1 iii

There were no suggested changes which were recommended for rejection.

9.2.2 Template 2 Discussion

Recommend accepting suggested changes / improvements specified in this report:

Section 9.1.2 ii, iii, iv

Recommend rejecting suggested changes / improvements specified in this report:

Section 9.1.2 i as this will negate the intended use of the template as a quick reference guide. Furthermore, the specific technical parameters are subject to change and variation and are therefore best left to be detailed within the additional resource guides.

9.2.3 **Template 3 Discussion**

Recommend accepting suggested changes / improvements specified in this report:

Section 9.1.3 i with, in addition to adding in references, further clarification within Section 5.1

Section 9.1.3 ii

9.2.4 **Template 4 Discussion**

The number of comments, and strength of feeling conveyed within their wording, clearly demonstrates significant concerns from the sector with the template in its current format. The level of detail required is beyond that which can be deemed reasonable, and as such needs to be drastically reduced. In line with the recommendations contained in 8.2.1;

Recommend reviewing the Statement of Significance template, and associated guidance for completing, with a view to significantly simplifying it (including consideration of the current Statement supplied by commercial units to the Treasure Trove Unit as part of the reporting process) in order to address comments specified in this report:

Section 9.1.4 i, v, vi, vii, viii, ix, x, xi, xii, xiii, xiv, xv, xvi, xvii, xix

Recommend accepting suggested changes / improvements specified in this report:

Section 9.1.4 ii, iii

Section 9.1.4 xviii – clarify that this will be for the museum to complete as the number won't be known in advance of accession

Recommend rejecting suggested changes / improvements specified in this report:

Section 9.1.4 iv – the template has indicative spacing only and .doc versions will be made available along with editable .pdf formats so that text boxes can be expanded as required.

9.2.5 **Template 5 Discussion**

Following on from the comments received in relation to Template 4 above, this template will also be subject to review, or even, depending on the extent of the simplification of Template 4, complete removal should guidance on how to complete Template 4 be deemed no longer necessary.

Recommend reviewing the Statement of Significance template, and associated guidance for completing, with a view to significantly simplify it (including consideration of the current Statement supplied by commercial units to the Treasure Trove Unit as part of the reporting process) in order to address comments specified in this report:

Section 9.1.5 i, ii

9.2.6 **Template 6 Discussion**

No comments suggesting changes or improvements were received so this will remain unchanged in the final version of the guidance document.

10 Any Other Feedback on the Guidance

10.1 Consultation Feedback: General Comments

In total, 1 respondent provided no response at all to this question, 3 confirmed no amendments were required, and 10 provided comments. These comments have been grouped below according to common theme. Note that some of the respondents gave responses that have been split between the themes.

‘Section’ references within quoted comments refer to the draft standards consulted on, while ‘Section’ references not within quoted comments refer to sections within this consultation report.

10.1.1 General Comments

- i. *“I think images for explaining things/ procedures will be a big help.”*
- ii. *“Would be good to have timeframe for response from TT once submissions by depositors - currently very variable and unpredictable. Also once assemblages have been allocated it would be great to have an agreed timeframe for transfer as often museums appear not to have space for allocated assemblages and this creates significant storage issues for depositors premises.”*
- iii. *“Welcome these guidelines - as well as benefits to commercial organisations like us it will be a good opportunity for e.g. community groups to standardise approach. Especially welcome conservation guidelines / setting of standards. Will see big improvements in stability of artefacts and assemblages.”*
- iv. *“Any increase in contact between archaeologists active in AREA BLANK, whether commercial, academic, community projects, and our Museum will be greatly welcomed.”*
- v. *“When it comes to extrapolating to individual metal detectorist finds or even detectorists’ small assemblages allocated through declaration to the*

TTU, the procedure for “Museum ready” will need to be presented in a user-friendly form on a scale for the context.”

- vi. “We agree with the Executive Summary.”*
- vii. “While there is a need to update how assemblages are deposited in museums, there are also concerns about many museums having both staffing and storage problems. There are also the concerns on costs and the financial strain this could bring to many Community Groups who do not have the financial backing that the Commercial archaeology companies have.”*
- viii. “I thought this was an excellent & very thorough report. well researched, thought through & presented. Obviously a significant amount of work has gone into it. Thank you to those involved.”*
- ix. “I’m delighted to see this take shape - thank you everyone for your involvement.”*
- x. “This is a major step forward - it is key that assemblages arrive in museums in suitable storage and with associated data which can be imported into collections management systems. Without these the assemblage will become unusable for future research and display purposes - as has happened so many times in the past.”*
- xi. “This will be of great assistance to us in the future. Thank you.”*
- xii. “Given that proposals in both current consultation documents (Implementing a museum processing fee for archaeological assemblages in Scotland and New draft guidance for the minimum standards for the transfer of archaeological assemblages to museums in Scotland) follow the ‘re-imagining Scottish archaeology’ proposal, there does seem to be an agenda of sorts to use Scotland’s Archaeology Strategy as a means to address perceived problems related to commercial archaeology (whether or not these perceptions are accurate or address the core underlying*

issues) but fail to address other sectors of archaeology. For instance, we would question if university-led fieldwork should be exempt from this proposed system of assemblage deposition, but instead should be included at the outset as a measure to encourage university archaeologists to adopt the same standards of work (e.g. ClfA standards) that professional contractors do. There is a wide gap between the skillsets new graduates are leaving universities with and the skillsets and qualifications that ORGANISATIONS require from these same graduates upon entering the profession.”

- xiii. *“Looks great!”*
- xiv. *“Having both worked in the museum sector as well as for many years in both research and commercial excavation, we appreciate the need for guidelines.*
- xv. *It is the responsibility of excavator / unit to assess excavated material- with the proviso that often one takes soil samples- or retains modern material- on a temporary basis to allow for considered judgement as to their usefulness in understanding the site. The fact of taking a sample does not mean it has a value. As excavators we need to make this judgement.”*
- xvi. *“Notwithstanding that we are opposed to the introduction of the guidance in its current form, we would welcome the opportunity to join in the development of the guidance in the next stages and would be keen to help and advise in any way that we can. We have many years of experience archiving assemblages to depositories across Scotland and feel that this knowledge and experience would be invaluable.”*
- xvii. *“We think that guidance for archaeological archiving standards within Scotland will be very useful. We are keen to help progress the document and hope that the final document will be something that is useful to, and usable by, all stakeholders.”*

- xviii. *“We would like to stress the importance of archaeological companies being informed well in advance of the date by which any new standards will apply, so we can plan implementation. We recommend only applying them to new projects after a certain (widely advertised) date, not to projects which are already notified to TTU and which are caught up in their backlog.”*
- xix. *“The document as a whole is poorly written and badly organised, leading to repetition, inconsistencies and conflicting advice throughout. It needs a good proof read and consideration given to the flow of information through the document.”*
- xx. *“We would welcome further integration in the process through OASIS V, as seems to be the case for England. This would improve links between the assemblage and the reports and other data.”*
- xxi. *“More communication between the repository and the archaeological contractor would lead to potential for a pre-deposition discard policy to be put into place so museums do not have to do this themselves due to receiving material they will later discard or end up not bidding for an assemblage through the TTU process because of what it contains.”*
- xxii. *“One museum already requires items to have accession numbers written onto the assemblage before they will be accepted. Maybe this would help other museums? Alternatively, we could convert our data to fit in better with museum formatting / databases to ease their load. Although any moves in this direction would require further consultation due to the additional time/cost burden it places on archaeological contractors.”*
- xxiii. *“We have deposited numerous assemblages with museums over the last 20 years and have only once had any feedback from a museum. If these standards are adopted, we would expect an acknowledgement from the museum that the assemblage has been assessed as being at the correct standard.”*

- xxiv. *“Excellent piece of work and we look forward to hopefully seeing it working in practice very soon.”*
- xxv. *“These guidelines are excellent. It will make it so much clearer for everyone involved in the process and will make working with assemblages hugely easier for museum staff that have no archaeological expertise. As result of this will be that assemblages will become far more accessible to the public / researchers. Thanks so much for all the hard work that's gone into these draft guidelines.”*
- xxvi. *“The guidance was developed by the Museum Working Group of Scotland’s Archaeology Strategy, which includes no representatives from a purely depositor organisation, which appears to have resulted in a slightly unbalanced perspective.”*

10.1.2 **Technical or language specific amendments**

- i. *“Section 1.1 - CHANGE ‘...Museums ‘will’ to ‘may’ (or ‘have the right to’) only accept assemblages which meet the requirements set out in the rest of this document. These guidelines should be followed by all archaeological projects in Scotland which generate an assemblage.”*
- ii. *“Section 1.3 – ‘...As such, the same best practice should be followed by universities, researchers, INSERT ‘and where possible’, voluntary groups, and any other part of the sector involved in the finding, removal, and reporting of archaeological material.”*
- iii. *“Section 1.4 - specify that these standards also apply to the movement of material during the post-excavation process.”*
- iv. *“Section 7.0.11 The AAF and ADS were not the authors of this European standard. That was K. Perrin et. al. on behalf of the EAC. Better to use this link rather than the wiki.: <https://www.europae-archaeologiae-consilium.org/eac-guidlines>.”*

- v. *“ORGANISATION BLANK wishes to emphasise an important fundamental of archaeology in commercial practice: these are not our assemblages. Commercial practice is transactional [AND] provides archaeological services to those who need them, we do not initiate projects, we do not secure funding for projects, rather we charge clients for the provision of archaeological services they need. The records and reports we produce are constrained in part by our intellectual rights – but this does not make an assemblage ‘ours’. It must be recognised that Landowners / Clients / Applicants are the primary agents.*
- vi. *The challenge is not for Museums to build an obligatory / ethical / regulatory relationship with commercial archaeologists: but they need to build one with our Clients whose material it is (or whose actions have released the materials from the ground in the case of Ownerless Goods).”*
- vii. *“Guidelines for ceramics of all periods were published in 2019 in this Historic England funded document <https://medievalpottery.org.uk/wp-content/uploads/2019/12/A-Standard-for-Pottery-Studies-in-Archaeology.pdf>”*
- viii. *“Many terms are undefined (e.g. 'finds assemblage', 'qualified specialist', 'small finds, 'bulk finds'). A definitions section would be helpful. It would also be beneficial to make terms consistent with the standards on which this guidance is based - e.g. common usage is now 'registered finds' rather than 'small finds'.”*
- ix. *“There isn't much guidance on archive compilation as a separate stage of the project. Section 3.9 doesn't really cover it because there is a whole level of documentation to include. 5.3 just lists things to include rather than detailing the tasks to be undertaken. So, for instance, 5.3.2 seems to require the digitization of drawings but that is not specified as a task to undertake during archive compilation. This guidance might work better if it is structured around the components of an assemblage (bulk finds, registered finds, samples - subdivided as necessary metal, organic etc)*

and the tasks people have to carry out: recovery, treatment, documentation, assessment/analysis, compilation, transfer.”

- x. *“Section 7.0 is headed 'Additional Resources' but are these not the primary sources and where you would go to find out exactly what you are supposed to be doing to meet the standards to which this document is a guide? If so, then references to the appropriate sections might be required in the text, to enable users to find the detail they need. Either way, this document needs to be more comprehensive, better structured and more user-friendly.”*
- xi. *“The glossary should refer directly to the ClfA ‘Standard and Guidance for the Creation, Compilation, Transfer and Deposition of Archaeological Archives’ (2014). The general link to ClfA guidance is also useful. Reference to the ClfA Selection Toolkit could also be considered.”*

10.1.3 **Additional clarification required**

- i. *“One area that might require some thought is monitoring and compliance. I wonder who Museums can go to if they find that guidance hasn’t been followed? Who will monitor that guidance is being followed? Would Museums be able to return finds? If so, would they want to if they thought artefacts might be damaged (i.e. transporting twice with inadequate packing might not be a good idea). What are the consequences if Units / sole traders do not follow the guidance? It might be a good idea to lay this out in the document as this will be the document that units etc will follow.”*
- ii. *“Delivery of the finds to the museum does not include reference to how this will happen. E.g. whether they are to adhere to standard museum courier practices. Can we ensure that the security and environmental conditions for the finds in transit is considered?”*
- iii. *“Perhaps offer some guidance on where to purchase appropriate packaging.”*

- iv. *“In general we think some more detailed specification of materials could be useful. Are there British standards for these? Otherwise links to a reputable supplier (as examples) or even things to avoid might be useful – thinking of certain marker pens etc. which aren’t very permanent. Can museums supply, at a cost, the type of boxes they want?”*
- v. *“It would be useful if disposal could be further referenced, possibly for Section 5. Although the standard will hopefully encourage disposal of finds/samples where required in the levels set for packaging/conservation etc, it would be useful if further awareness of this could become standard practice. Selection criteria be subjective within the guidelines as to retention and significance. Consultation with likely allocation bodies should be encouraged and greater confidence to select reduced material encouraged.”*
- vi. *“There is a climate change and sustainability aspect to disposal strategy. Is this aspect eligible for an SEA (Strategic Environment Assessment)?”*
- vii. *“Re Section 5.4: I understand that this is meant to be a guide to standards that can be found elsewhere but in 5.4 the term 'expected standards' doesn't really help. The document includes some things in great detail (e.g. 3.4, how to pack 'small finds') but misses out a lot of other things (e.g. in what form copies of documents should be produced. What exactly are the expected standards?”*
- viii. *“ some of those documents [INCLUDED IN SECTION 7] may contradict each other - has that been checked?”*
- ix. *“Although in the introduction the document explains that the guidance relates to ‘archaeological assemblages’ or ‘archaeological material’, the document also makes reference (e.g. paragraph 3.8.7, and 5.3 Appendix 3) to deposition of digital files, photographic material on CDs, etc. It may be helpful to clarify the nature of these archive materials to ensure that no confusion with the full digital archive is created. For instance: Are these digital files simply those associated with documenting the assemblages?”*

- x. *“It would be useful to more broadly clarify the relationship with paper and digital archives or to provide an explanation or signpost to parallel guidance for paper / digital records. This could be done with reference to explaining NRHE and HES digital archives, particularly where this separate system may create confusion with ClfA Standards which define these facets of the archaeological archive as a single unified whole.”*

10.2 Consultation Discussion on General Feedback and Comments

10.2.1 General Comments

On the whole the majority of comments are positive and welcome this initial drafting of a minimum standard for everyone to adhere to in the future. Predictably the notes of caution or concern primarily come from those parts of the sector which to date have not been involved in the initial drafting of this document. This is best summarised by the comment “*Notwithstanding that we are opposed to the introduction of the guidance in its current form, we would welcome the opportunity to join in the development of the guidance in the next stages and would be keen to help and advise in any way that we can.*” The project team welcomes such offers of assistance, and indeed no such guidance could, or indeed should, be finalised without sector-wide input and approval.

Below, ‘Section’ references within quoted comments refer to the draft standards consulted on, while ‘Section’ references not within quoted comments refer to sections within this consultation report.

Recommend establishing a working group with sector-wide representation (including universities and community heritage groups, but particular emphasis on the commercial sector) to develop the next draft of the minimum standards. This would address comments specified in this report:

Section 10.1.1 i, iii, xix, xx, xxiii, xxvi

Furthermore, one comment (*Section 10.1.1 v*) referred to the implementation of these standards for chance finds and metal-detecting assemblages. At this time, owing to the different process which they are subject to under Treasure Trove and the difficulty for individual members of the public to meet such requirements, it is not intended to extend these standards to members of the public outwith community heritage projects.

Concerns were also raised around the cost impact on such community projects, or that the standards are only going to be applied to the commercial sector. While acknowledging there will be an increased cost for all those who generate archaeological assemblages, it should not be a matter of chance as to how such assemblages are treated depending on who has found them. Future project designs and funding bids will allow appropriate planning for the increased costs, and indeed will help ensure that all assemblages have a lasting legacy beyond the immediate project which generated them in the first instance. An additional advantage of universal implementation, in particular adoption by the university sector, of the standards is that it would help ensure that new graduates have the appropriate skillsets for entering the profession.

Recommend implementation of the new minimum standards and guidance for all parts of the sector except for chance finds made by members of the public and metal-detectorists. This would address comments specified in this report:

Section 10.1.1 v, xii

Comments also once again highlighted opportunities for improving communication between stakeholders during the Treasure Trove process of allocation, in particular agreeing timescales in order to remove the current unpredictability of the process.

Recommend establishing a working group with the Treasure Trove Unit to discuss these issues and develop solutions, with the same group developing the resources such as the flowchart discussed in 7.2.1. Representation should include FAME, ALGAO and MGS. This would address comments specified in this report:

Section 10.1.1 ii, xxi

Finally, the intention is for these new minimum standards and guidance to not be introduced retrospectively to any existing project, that the standards

will only apply to new projects from an agreed implementation date going forward with an agreed advance notice period.

Recommend the new minimum standards are not applied retrospectively, and advance notice of adoption date must be given to Museums Galleries Scotland, the Federation of Archaeological Managers & Employers, the Museums, the Chartered Institute for Archaeologists, appropriate representation from the construction industry, the Association of Local Government Archaeologists, Historic Environment Scotland, Universities, and appropriate representation from the community heritage sector. This would address comments specified in this report:

Section 10.1.1 xviii

10.2.2 **Technical or language specific amendments**

Recommend accepting suggested changes and improvements specified in this report:

Section 10.1.2 i, iii, iv, v, vii, viii, ix, x, xi

Section 10.1.2 vi – improvement in communicating why these standards are required, including the long-term public benefit, needs to be undertaken, and in particular shared with those funding the work in the first instance.

Recommend rejecting suggested changes and improvements specified in this report:

Section 10.1.2 ii – community and voluntary groups should be dealing with all aspects of fieldwork they undertake in an acceptable manner, including adequately preparing assemblages for museum deposition.

10.2.3 **Additional clarification required**

Two responses highlighted a need for guidance on where to purchase suitable packing materials which would meet the expected standards. As noted previously in Section 6.2.3, this issue was referred to elsewhere in the consultation feedback and the same solution is repeated here. These comments also usefully illustrate the current lack of understanding between museums and parts of the sector over what can be deemed acceptable practices. The introduction of these standards will hopefully remove this uncertainty in the future.

Recommend developing an ad hoc list of packaging suppliers to aid those seeking to purchase suitable materials. No particular company can be recommended, but a flexible ad hoc list can be maintained without infringing procurement rules. This would address issue specified in this report:

Section 10.1.3 iii, iv

Another area of uncertainty relates to the ongoing enforcement and monitoring of the standards once they have been implemented. This is a complicated issue owing to the overall timescales involved, the change in legal ownership during the course of the allocation process, and the involvement of more than one stakeholder in overseeing elements of that process. Of course, this should not preclude a solution being sought, and consideration of the role of funders, professional institutions, and the key organisations overseeing the process will be required. For example, retrospective action may be a more practical solution whereby an organisation which refuses to comply with the standards becomes ineligible for future funding bids, and denied consents for excavating designated sites. As noted within Section 9.2.1 the recommendation made there to address the issue of a ‘failed site’ should be expanded to include those sites that do not comply with the standards.

Recommend establishing a short-lived working group with sector-wide representation to discuss this issue and create a step-by-step process for dealing with a ‘failed site’ and ‘non-compliance with the standards’. Representation should include MGS, ClfA, TTU, ALGAO, FAME, HES and key funders. This would address issue specified in this report:

Section 10.1.3 i

Recommend accepting suggested changes and clarifications specified in this report:

Section 10.1.3 ii – text to be agreed with key stakeholders to establish whether a reference to standard courier practices is enough or whether this needs to be defined within the guidance.

Section 10.1.3 vii, viii, ix, x

Section 10.1.3 v – this will be covered by the recommendation within Section 5.2.3 which will examine selection strategies.

Recommend rejecting suggested changes and clarifications specified in this report:

Section 10.1.3 vi – the processes detailed in this guidance do not meet the criteria for undertaking a Strategic Environment Assessment.

11 Recommendations and Next Steps

11.1 Overwhelming support for the introduction of minimum standards for the transfer of archaeological assemblages to Scottish museums has been established through this consultation. Furthermore, implementation of the new minimum standards and guidance will apply to all parts of the sector with the exception of chance finds made by members of the public and metal-detectorists. Finally, the new minimum standards will not be applied retrospectively, and advance notice of their adoption date will be given to Museums Galleries Scotland, the Federation of Archaeological Managers & Employers, the museums, the Chartered Institute for Archaeologists, appropriate representation from the construction industry, the Association of Local Government Archaeologists, Historic Environment Scotland, universities, and appropriate representation from the community heritage sector.

However, significant improvements to the draft document as it currently stands must be made first before it can be considered fit for purpose. In order to achieve this a series of recommendations have been made throughout this report with the intention, as it has always been, that the next draft of the standards is undertaken in collaboration with wider sector involvement. Below, all of the recommendations within this report have been grouped and simplified according to type for ease of reference:

11.2 Recommended New Working Groups to resolve highlighted issues

Working Group 1 - representative of the sector, to be established with the Treasure Trove Unit to examine and resolve issues over when assemblages can be claimed or not, whether provisional claim status can be assigned, and what should or should not be retained as part of the assemblage under selection and disposal strategies in

line with *Bona Vacantia*. Decisions to be reflected within text updates and/or additions to the Standards.

Working Group 2 – representative of the sector, with a particular emphasis on community archaeology to identify how such groups will be impacted by the proposals, and to develop supporting resources to help those same groups implement the minimum standards.

Working Group 3 – representative of the sector, to create a definition for ‘ethical’ within the context of assemblage disposal, the agreed definition to be added to the Standards.

Working Group 4 – representative of the sector (with particular emphasis on the commercial) to review the wording and intent of Section 5.4 of the Draft Standards with regard to dealing with unknown costs which emerge after post-excavation costs have been agreed, and the potential conflict this raises with meeting these standards. Furthermore, this group will also create a step-by-step process for dealing with ‘failed sites’ and ‘non-compliance’ in relation to these Standards.

11.3 Recommended Technical or Language Amendments to be made to the Standards

Section 5.1.2 i, iii, iv, v, Section 6.1.2 i, ii, iv, v, vi, vii, viii, ix, x, xii, xiii, xiv, xvi, xvii, xviii, xix, xx, xxi, xxii, xxiii, xxiv, xxvi, xxvii, xxix, xxx, xxxi, xxxii, xxxiii, xxxiv, xxxvii, xxxviii, Section 6.1.2 xv (further stakeholder discussion will be required to properly populate this list), Section 6.1.2 xxv (this will need further clarification), Section 6.1.2 xxviii (given the potential H&S implications this will need further discussion, including whether achievable outwith a museum setting), Section 6.1.2 xxxv (this will need further clarification), Section 6.1.2 xxxvi (this will need further stakeholder discussion over whether specifics can

be agreed or not), Section 7.1.2 i, ii, iii, iv, v, vi, Section 8.1.1 i, iii, ix (a significant simplification of the Statement of Significance), Section 8.1.2 i, ii, iii, iv, v, vi, vii, viii, ix, x (include reference to museum's which don't accept human remains), xi, xii, xiii, xiv, xv, xvi, xvii, xviii, xix, xxi, xxii, xxiii, xxiv, xxv, xxviii, Section 8.1.2 xx (relates to the Statement of Significance and changes made here will need to reflect the wider revision of this template within the guidance), Section 8.1.2 xxvi (will need to have text which aligns with the guidance document produced for the Museum Processing Fee), Section 9.1.1 i, ii, iv, v, Section 9.1.2 ii, iii, iv, Section 9.1.3 i (with, in addition to adding in references, further clarification within Section 5.1 of the Draft Standards), Section 9.1.3 ii, Section 9.1.4 ii, iii, Section 9.1.4 xviii (clarify that this will be for the museum to complete as the number won't be known in advance of accession), Section 9.1.5 i, ii, Section 10.1.2 i, iii, iv, v, vii, viii, ix, x, xi, Section 10.1.3 ii (text to be agreed with key stakeholders to establish whether a reference to standard courier practices is enough or whether this needs to be defined within the guidance), Section 10.1.3 vii, viii, ix, x, Section 10.1.3 v.

11.4 Recommended Clarifications to be agreed and added to the Standards

Recommendation 1 - discussion with Treasure Trove Unit and creation of a clear statement on timescales expected for reporting, claiming, disclaiming, and allocating assemblages.

Recommendation 2 – expanding text and definitions as required; *Section 5.1.3 vii, ix, viii, xi, Section 6.1.3 ii, iv (with caveats), v, vi, vii, viii, ix, x, xi, Section 7.1.1 i, iii, v, vi, viii, ix, Section 7.1.3 x, Section 8.1.1 vi, Section 8.1.3 iv, v, ix, xi, xii, xiii, Section 8.1.3 vi (to be clarified within the flowchart referred to within 7.2.1 and the Museum Processing Fee guidance document), Section 8.1.3 viii (to be clarified within the Working Group 1),*

Recommendation 3 - entire document is reviewed and reordered in order to make it more understandable and easier to navigate, including a glossary of key terms used.

Recommendation 4 - sector-wide discussion on the issue of ecofactual samples, ‘what should or should not be retained’, and appropriate clarification added to the Standards.

Recommendation 5 - create an agreed statement on ownership for all elements of an archaeological assemblage, and for each stage of the process from discovery to allocation / disposal, for including within the Standards.

Recommendation 6 - discussion with FAME and Treasure Trove Unit to establish whether assemblages being split between two different museums happens, and if so, to establish a clear statement within the Standards and the Museum Processing Fee guidance on what happens in such situations.

Recommendation 7 – sector-wide discussion over x-rays to establish actual costs, limitations, and whether there is an identified requirement for digitising x-rays as part of an assemblage transfer.

Recommendation 8 - that a statement is added to the Museum Processing Fee guidance that a single fee only is payable in relation to any single archaeological assemblage.

Recommendation 9 - discussion with FAME, HES, MGS and representatives of the universities to clarify and agree wording over copyright and intellectual property rights for inclusion in the Standards, and for use within wider documentation in the sector.

Recommendation 10 - review the Statement of Significance template, and associated guidance for completing, with a view to

significantly simplifying it (including consideration of the current Statement supplied by commercial units to the Treasure Trove Unit as part of the reporting process).

11.5 Recommended additional resource development to support the Standards

Recommendation 11 - create a list of conservation facilities and services, with their locations, and conservators for easy reference to those seeking their input.

Recommendation 12 - develop an ad hoc list of packaging suppliers to aid those seeking to purchase suitable materials. No particular company should be recommended, but a flexible ad hoc list can be maintained without infringing procurement rules.

Recommendation 13 - develop a process flowchart highlighting key milestones, core documents, communication exchanges, roles and responsibilities, and timetables associated with each stage of reporting and allocating an archaeological assemblage. This flowchart will need to be developed in conjunction with the Treasure Trove Unit.

Recommendation 14 – in conjunction with the Treasure Trove Unit, create a ‘how to’ guidance document for valuing assemblages from an insurance perspective.

Recommendation 15 – create a system for reviewing the guidance document and templates, in consultation with the sector, to establish how successful the implementation has been of the Standards, what issues have been encountered, and what changes – if any – are required. A suggested timetable for the initial review would be one-year after formal implementation of the standards.

Recommendation 16 – write a short explanation for use in communicating why these standards are required, including the long-term public benefit, for sharing with those funding the work in the first instance.

11.6 Next Steps

Establish a working group with sector-wide representation (including universities and community heritage groups, and particular emphasis on the commercial sector) to develop the next draft of the minimum standards, including overseeing the completion of the above recommendations.

12 Acknowledgements

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