

The Queen's and Lord Treasurer's Remembrancer
Treasure Trove Consultation
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30 July 2013

Dear Ms Dyer

CONSULTATION ON REVIEW OF: 'TREASURE TROVE IN SCOTLAND, A CODE OF PRACTICE'

The Society of Antiquaries of Scotland is an independent not-for-profit membership organization founded in 1780 and awarded its Royal Warrant in 1783. It is the premier antiquarian society in Scotland and with its thousands of members it promotes research, understanding and conservation of the archaeological and historic environment of Scotland for the benefit of all.

With regard to Treasure Trove the Society has had a long and important involvement in the development of the system since the mid-19th century (see the *Proceedings of the Society of Antiquaries of Scotland* vol.3 for 1857-60 pp. 76, 204 & 235) and more recently the Society organized the November 2002 seminar on 'Treasure Trove: Problems and Potential' which led to the *Normand Review* and ultimately to the existing *Code of Practice*.

Please note that the Society will be pleased for this response to be made publically available and to receive further contact from the QLTR (the completed Respondent Information Form is attached).

Introduction

The Society welcomes this opportunity to respond to the Treasure Trove *Code of Practice* consultation and in the paragraphs below the consultation questions are taken in turn. There are some important preliminary points to be made about this consultation, however. In the introductory section (§6-8) the matters ruled *ultra vires* to this consultation are precisely those which inhibit and undermine the operation of the *Code of Practice*. The fact that these matters are mentioned here in this way makes it clear that the QLTR is cognisant of them, yet apparently is unable to engage with them. The Society strongly recommends that the QLTR, SAFAP, and Government – in collaboration with the wider sector (and this Society would assist in any way possible) – should engage urgently with these matters to address and resolve concerns which potentially bring the Treasure Trove system into disrepute and prevent the delivery of its largely latent public benefit. Everyone is aware of current financial and other restrictions, but the Society disagrees that the development and improvement of the Treasure Trove system lies outwith the remit of the QLTR (§6).

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Q.1 Do you have any comments in relation to the clarification of any of these points which it is proposed to make in a revised Code?

§17. The intention to clarify the transfer of ownership of allocated items to museums is welcomed. However, the Society does not welcome the abnegation of Crown interest thereafter. Given the uncertainties in museum provision and resourcing throughout Scotland there must be concern over the future and security of collections. Whilst this situation is managed through the museum accreditation system the Society would advocate the continued interest of the Crown to avoid the possibilities of loss, disposal, sale, or inappropriate transfer that might arise. It would be wrong if the Crown were, for example, to ignore a situation where former Treasure Trove finds ended up on the open market. Items which are important enough to be claimed by the Crown in the first place warrant monitoring in perpetuity so that a record is maintained of the location of claimed items. The Society envisages this could be achieved relatively easily and more or less automatically by electronic means, and could be incorporated into the transfer of items to a museum without obscuring the transfer of ownership.

§18 The Society feels that the existing paragraph 1.3 is appropriately concise and informative. Care should be taken not to dilute the status of the *Code* or to give the impression that the QLTR intends to disregard the guidance, which would remove confidence in the *Code* and the position of SAFAP. The wording in §18 also touches the issue raised in our introduction of whether the QLTR or Scottish Ministers have the authority to override the *Code*.

§19 The Society recognises the accreditation scheme for museums and Galleries in the United Kingdom and the benefits of broadening the interest in archaeological material that could arise from all such museums conserving and promoting that material to their particular audiences. We would however, emphasise that many such museums do not have specific archaeological or relevant curatorial expertise and we would advise that the *Code* encourages such recipients of Treasure Trove to access archaeological advice in their curation.

§20 It is the Society's understanding that it is not the claim which is contingent and this proposal could dilute the value of the Crown's claim; the claim is made on the basis of material having been deemed Treasure Trove by the Crown (via SAFAP/QLTR) and is therefore definitive. The system should ideally operate on the basis that all material which meets the criteria to be claimed is allocated. Whilst there will always be circumstances when disclaiming after claiming will occur, they should be the exception. If disclaiming is happening frequently then the system is not functioning well and requires adjustment, but not by allowing disclaiming to become the norm.

§22-23 Rather than clarify, this proposal could add to the confusion. If material has not been claimed then it cannot be disclaimed. The term unclaimed is admittedly inelegant and itself open to misinterpretation, so the Society suggests the simple solution would be to avoid its use. As the Society understands it, 'unclaiming' is in effect undertaken by the TTU on behalf of SAFAP/QLTR and is mainly used with respect to the certificate which the TTU issues and which is shown in Appendix D of

the *Code*. If the title of the certificate is removed, or changed to “Item(s) not claimed certificate” or similar, then the document is still effective in certifying that ‘The Crown has chosen not to claim this find/these finds’. In the flow-chart in the *Code* (p.12) it could simply say ‘not claimed’ and ‘certificate issued’, and a similar formula could apply wherever else ‘unclaim’ occurs in the *Code*.

§24 While it is welcomed to clarify what is not subject to *bona vacantia* the revised *Code* should also highlight the scientific value of human and animal remains, geological specimens and environmental samples, and encourage museums to acquire complete assemblages. Even if no museum is interested in taking it, it would be useful for the Treasure Trove process to highlight this as a problem case and work within a sectorally agreed strategy for dealing with such cases. This strategy would aim to link directly to the stated purpose and aims of the Treasure trove process to serve successfully in preserving the material evidence of Scotland’s past for the future. The Society would strongly urge the QLTR, SAFAP and Government to engage with the Archaeology Strategy for Scotland (under development by Historic Scotland) which could help to address these issues, and will require the facilitation of communication of such problem cases.

Q.2 Are there any other points in the Code which you think require clarification? If so please provide an explanation or an example.

Clarification is required over who is responsible for the Treasure Trove system. The current *Code of Practice* (p.5) makes it clear that ultimately this responsibility lies with Scottish Ministers, but equally that operational decision-making and administration is delegated to the QLTR, with “oversight” from the Scottish Government; presumably now the Culture and Heritage Directorate. It would assist this Society in making further representation on Treasure Trove issues to know who within Government is responsible for the Treasure Trove system, what the term “oversight” means in this situation, and which powers and responsibilities are delegated to the QLTR.

Q.3 Do you have any comments on the proposals in this section regarding *ex gratia* awards for chance finds?

§25 Agreed.

§26-28 This consultation is probably not the place to debate the valuation issues in detail, other than to comment that: a) the Society understands there is some concern within the Museum community about high valuations for some relatively common object types; b) providing finders in advance with indicative valuations has merit but presumably has resource and risk implications which need consideration; and c) greater clarity is required on the method by which valuations are reached, both in how the indicative valuations are obtained and in what expertise SAFAP brings to the process of valuation decisions.

§29 Historical valuations would be very difficult to calculate and arbitrate upon, and might be an encouragement to falsification of the date and circumstances of discovery, which would be detrimental to object history recording and increase costs.

The Society would advise that the award is not based value of the object current at the time of the find.

§30-31 Agreed.

§32 While the Society supports the intention here towards transparency and clarity, it is possible that that finders are likely to favour allocation to a particular museum. Should this preference be expressed in the form of offering to waive the entitlement if allocation is to museum 'X' but not if to museum 'Y' then SAFAP might feel its decision-making process compromised; this too would require transparency in the decision-making process.

§33-37 There are certainly merits in greater transparency over the valuation process and wider communication both in advance of and subsequent to the final valuation. However, there are consequences that would require to be carefully considered. For example, if the finder wished to acquire an independent valuation after being told of the indicative valuation this may necessitate the find being returned to the finder, meaning that a claimed find would be placed outwith the control of the Crown. There would also be a requirement for the valuations arrived at by both the TTU and SAFAP to be more rigorous and capable of substantiation. As indicated above (§26-28) this would expose the TTU and SAFAP expertise in valuation to scrutiny, perhaps inevitably leading to demand for a method of independent specialist valuation. Implementation of the latter might well be advantageous for various reasons, including the integrity of SAFAP decisions, but would obviously have financial and organizational implications.

§38-41 Agreed, although the Society would expect that any awards retained by the Crown as per §40 would go towards resourcing the TTU.

§42 It may be counter-productive to include this proposal in the *Code* since there may be various reasons for such delays. An alternative museum may feel it difficult to bid against another museum in this situation, and disclaiming the find in such a case would go against the indication that it was valued by a museum. The Society understands that seriously delayed museum payment occurs rarely and would urge a more imaginative solution be applied.

Q.4 Do you have any other comments in relation to *ex gratia* awards or the process for determining these in any case where such an award will be payable?

None.

Q.5 Do you have any comments of the size or composition of the Panel or the process for recruiting members to it?

§43 Whilst welcoming the move to enlarge the SAFAP membership the Society is keen to ensure that the appointment process results the expertise required. The purpose of *ex officio* membership must be to ensure relevant archaeological expertise no matter who is asked participate or to nominate a representative. The Society recommends that the *ex officio* appointment system is revised to take account of changes in circumstance, and that nominators for *ex officio* places be approached with

the explicit requirement that they have the appropriate expertise. Suitable bodies, in addition to Historic Scotland or the newly merged body, might include the Society of Museum Archaeologists, the British Numismatic Society, the National Council for Metal Detecting, the Finds Group AD 700-1700, the Institute for Archaeologists (IfA) Finds Group, and the Society of Antiquaries of Scotland.

§44 The current appointment process is cumbersome and off-putting but if it is to be replaced care will be required to avoid any criticisms of cronyism and nepotism. The problem would in part be solved by the revision of *ex officio* appointments recommended above, but for other members and the Chair the imprimatur of appointment by Government needs to be retained in any new appointment procedure. The Society would be keen however, that the new system does indeed take full advantage of the expertise on the panel, through the Chair.

Q.6 What changes to the Code or other practices might encourage applications for allocation of all or part of an assemblage to a museum?

§45-52 The Society considers it of critical importance for the current and future practice of archaeology in Scotland that the principle of claiming excavation assemblages be retained. This principle, whereby excavated finds are accorded national recognition and protected from unregulated dispersal and disposal is one of the great strengths of the Treasure Trove system and marks Scotland out as more responsible and enlightened than other parts of the UK in following up archaeological fieldwork. That said, the Society is aware of various problems in the current operation of the principle which require urgent remedy. For example:

- Archaeologists may not be rigorous and forward-thinking enough making the initial selection and retention of finds during fieldwork and post-excavation of assemblages before they are reported to the TTU
- The TTU does not appear to be able to undertake appropriate assessment of assemblages prior to claiming
- Museums do not receive sufficiently detailed information regarding the content of excavation assemblages to allow informed judgements to be made concerning acquisition
- The archaeology/museum sector nationally is encountering serious challenges with regard to the adequate provision of accommodation of, and accessibility to, excavation assemblages

The issues in these bullet points recur in subsequent paragraphs of this response.

The Society advocates the reassessment of current practices and the development of new ones in line with a sectorally agreed Archaeology Strategy for Scotland. This could include various requirements on project designs and archaeological briefs, such as detailed information and artefactual highlights to aid the Treasure Trove process.

Q.7 Do you have any views on a proposal that the TTU exercise discretion, as already happens for chance finds, as to what assemblages (or what part of an assemblage) should not be claimed by the Crown and so will not be put through the treasure trove processes?

If you are concerned about the TTU weeding material coming in to the system in this way do you have any suggestions how the amount of material coming in to

the treasure trove system which is likely to attract no bid for allocation might otherwise be controlled?

§53 The Society considers that there are often significant differences between the process of chance find reporting and archaeological assemblages that need to be taken into account here. Chance finds reported to the TTU are seen by staff either ‘in the flesh’ or in photographs, allowing them to make an informed judgement on their suitability or otherwise for claiming, either directly or by seeking further advice. Assemblages on the other hand are generally not seen by the TTU staff, with reliance on descriptions provided by the submitter. While presumably composed by experienced archaeologists, these descriptions may be neither detailed enough, nor necessarily accurate enough, for informed judgements to be made within a specific Treasure Trove context. Moreover, the Society is concerned that the TTU staff have the requisite range of expertise necessary to assess assemblages of all types and periods, or are able to call on such experience as required, and that this is maintained long-term through ensuring a highly skilled team with adequate ongoing CPD. The Society advises that a thorough review of the way in which assemblages are dealt with before, during, and after contact with the Treasure Trove system is required. Again this can be undertaken through a sectorally agreed national Archaeology Strategy.

Q.8 Do you have any other comments on the proposals in this section regarding assemblages?

§54 Agreed

§55 The Society disagrees with this proposal. In undertaking and developing the Scottish Archaeological research Framework it was clear that the already dispersed nature of the archaeological record was a serious challenge to subsequent research. The proposal to split an assemblage would only exacerbate this issue and allow and encourage museums to cherry-pick displayable items and leave remaining, no less archaeologically significant, items stranded. If a museum cannot house a given assemblage then it should not attempt to acquire part of it, but should leave the assemblage to another museum which can house it entire. The correct way for the museum which only desires specific items would be to request their loan from the museum which takes the assemblage.

The proposal for splitting assemblages covering different localities arising from road scheme projects etc. suggests that there is a problem in the way these assemblages are being reported to the TTU and SAFAP, and relates to our response to Q.7 above, whereby reporters need to better understand the Treasure Trove process and its requirements in terms of submitting material. The submitter should be responsible for ensuring the accurate subdivision of any such assemblage into material from separate Local Authority areas which could then be treated as separate assemblages and processed in the normal way. In the rare event of an assemblage deriving from a particular site which itself lay across a modern Local Authority boundary, then the assemblage should not be subdivided but should be allocated appropriately after consultation and agreement between the museums involved.

The Society appreciates that a situation could arise whereby the finds from a particular site are so prolific and iconic that there is merit in display in more than one

museum. The Society suggests that this should be achieved through inter-museum negotiation subsequent to TT allocation to a single museum.

§56 This proposed self-certification of significance would shift the assessment responsibility for assemblages from the TTU/SAFAP to the submitter. However, without adequate policies, training and a sectorally agreed framework process the Society has concerns that the submitters could in all cases make this kind of assessment. To illustrate this with just two scenarios: a) in many cases the archaeologists involved with excavation/post-excavation of an assemblage have no involvement with its submission for claiming and the actual submitter may be an administrator who has never even seen the finds and is working from finds lists and other hand-lists; and b) submitters may on occasion be very well aware of the significance of the part of an assemblage in which they have specific expertise, but completely unaware of the significance of other parts. In addition, there is currently no means for the reporter to highlight the importance or significance of any part of an assemblage in their submission (see §57 below).

The wording of this paragraph suggests that only excavation companies report excavated assemblages for the Treasure Trove process, whereas universities, local societies and individuals etc. can be involved in the procedure, and this should be a consideration in determining any self-certification of significance.

§57 The Society does not feel introducing the Waverley Criteria, which specifically pertain to the work of the expert Reviewing Committee on the Export of Works of Art and Objects of Cultural Interest, into the Treasure Trove context would be relevant or helpful. We would not support the proposal that excavators be asked to self-assess the significance of their assemblages against the Waverley Criteria; however, we do accept that a sectorally agreed set of criteria for assessing the significance of assemblages could be considered for development.

§58-62 This proposal to record an already existing practice in the *Code* appears to stem from the lack of a museum of last resort to ensure that material deemed claimable by the Crown is then safeguarded (which is the stated aim of the Treasure Trove process). While the Society would indeed encourage the interest of local groups, schools and volunteers in the results of archaeological fieldwork, we would advise that this should be accompanied by appropriate expert advice, and is more appropriate for material that is not claimed by the Crown. The issue of museum of last resort and the resources required for this process to fulfil its stated aim need to be discussed through the wider heritage and museum sector, and the ethical aspects of what happens to such assemblages debated and carefully considered before becoming a prescribed policy of the Crown through this consultation process.

§45-62 Underlying all the points raised in these paragraphs is the constant balance between standards and resources. The Society believes that a simple and potentially effective solution to several current challenges to the Treasure Trove process would be for TTU staff to inspect assemblages at the premises where they are housed prior to submission, in order to a) assess the significance of the assemblage, b) ensure the material is in 'museum-ready' condition, and c) confirm that associated documentation is in order. The Society understands that the TTU currently may not have the staff or resources to achieve this, while similar processes are undertaken by

Historic Scotland for assemblages that it has funded the excavation of. The Society encourages the QLTR, SAFAP and Government to develop imaginative solutions to improve this situation. The returns for what may amount to relatively small increased resource through, for example, increased collaboration and sharing of expertise and resource between government departments and other stakeholders would increase efficiency and make savings in the long-term.

In addition, the sector as a whole must engage with the issues highlighted through this consultation to develop best practice and consider how it ensures that ethical integrity is maintained and the public benefit of the Treasure Trove system released.

Q.9 Are there reasons why a museum might decide not to seek allocation of treasure trove which it might otherwise wish to see in its collection? If so, are there any obstacles which can be removed from the Code or the treasure trove process? We would be particularly interested in any proposals which would not require additional resources or which would not involve a change likely to discourage the reporting of chance finds.

§63-83 This is multi-faceted, but amongst the reasons may be:

- Insufficient or belated information provided to bidding museums
- Absence or lack of relevant staff at a museum
- Inadequate storage and/or other restrictions on increasing collections at a museum
- Insufficient funding for Treasure Trove purchases available to a museum

The only one of these which could be resolved through the Treasure Trove system would be the first. There are also likely cases when national or regional museums would be inclined to seek allocation, but are deterred by the assumption that a local museum will be seeking allocation. Notification from the TTU that the latter is not so, in good time before the deadline for a SAFAP meeting, would be beneficial (and would complement the proposal in §95).

Q.10 Do you have views on the standing profile option or on the option for automatic allocation of treasure trove to a museum if only a single application for allocation is received? Which of those options do you prefer and what are the reasons for your preference?

§63-76 The Society concurs with the proposal to simplify the allocation procedure and would support the automatic allocation procedure in Option 2.

However, the Society would urge the *Code* to include encouragement to museums that do not have archaeological expertise in house to seek such advice when acquiring relevant material. In addition, the Society is aware of, and supports, the development of Kelvinhall with HLF backing as a centre for excellence for collections research, including exhibition space, and is keen for other regions to consider similar models.

Q.11 Do you have views on what is proposed where there is competition between museums for allocation of treasure trove?

§77-83 The Society would advocate a further simplification of the situation where multiple applications are received. Rather than build in added delay and bureaucracy

to the process, SAFAP should make the decision on the basis of the original applications for allocation and taking into account its own knowledge of the applicants and the finds involved. The Society is not aware that the further information supplied against the Criteria specified in Appendix L of the *Code* ever proves definitive in assisting SAFAP to a decision. SAFAP could be more informed and confident in its decision making over recommendations to the QLTR; the criteria proposed in §83 should be relevant to every application for allocation, not just to competing ones. Nor does the Society recommend any major change in the wording of para 9.11 of the *Code*, since it already encourages collaboration, although the specific use of Memoranda of Understanding may not be relevant in every case. If the wording is changed, it should avoid encouraging joint applications/allocations because these are the worst outcome of a multiple application scenario.

Q.12 Do you have any other comments in relation to the allocation of treasure trove to a museum or the process that applies?

None.

Q.13 Do you have any comments on this section regarding acknowledgement of the treasure trove system on a display of an artefact by a museum; would this proposal cause museums difficulties or concerns or might it have unforeseen consequences – if so what are these?

§84-87 Agreed. Recognizing the Treasure Trove system through museum displays and labels in this way would be welcome and could be achieved with minimal text in conjunction with the logo. In fact the TTU might usefully supply a small card with suitably worded non-specific short text which any museum displaying Treasure Trove items could place next to an object when on display.

Q.14 Do you have any comments on this section regarding acknowledgement of finders on a display of an artefact by a museum; if so:

a) would this be welcomed by finders and might it encourage the reporting of objects,

b) should any arrangements be voluntary or mandatory – if so why, and if mandatory what requirements should apply and how might these be enforced

c) would a mandatory requirement cause museums difficulties or concerns or might it have unforeseen consequences – if so what are these?

§88-90 This suggestion is more problematic, although the concept behind the proposal is a good one. From a museum perspective chance finds acquired through Treasure Trove are in fact purchases and this is not usually acknowledged in displays (although it would perhaps be useful generally for museums to highlight that purchases are often made with either sponsors or public funds).

Moreover, a museum will normally not have had any direct contact with the finder of a Treasure Trove item. This is something to be left entirely to the discretion of individual museums and there should be no attempt to mandate this through the *Code*.

However, where known, information about the finder should always be made available to the recipient museum so that at the very least this can be included in their

documentation, and it can then follow up on potential acknowledgement and engagement at their discretion.

Q.15 Do you have any comments on the proposals in this section regarding museums of last resort?

§91-97 The concept of museums of last resort is dependent upon quality assurance being achieved through the Treasure Trove claiming process (in other words all claimed items and assemblages must clearly be ‘museum worthy’) and upon museums of last resort having appropriate resources and collecting policies for acquisition.

The Society is not clear that the concept is fully developed anywhere in Scotland, since the National and regional museums appear to operate selectively in this regard and none of them have unlimited resources with which to underwrite the concept. Insofar as the concept does currently apply, the Society is not persuaded that either of the proposals for allocation in §95-96 are entirely sensible or necessary. Given the fact that there are only four museum services participating the Society cannot see why SAFAP need do anything other than notify all four of the finds and assemblages in this category and let them decide amongst themselves on the allocation. This could be done after each meeting of SAFAP once the relevant valuations have been determined.

The Society also raises a query here over the absence of museums in certain regions agreeing to participate in allocation in this way, and hopes that Q.16 will increase the distribution. If they are unable to take such claimed material from their region as a museum of last resort, should they be given preference for allocation of the items for which they selectively do request allocation?

Q.16 We would be interested to hear from any other museum which might wish to be considered as a museum of last resort for any area; please identify the area to which that interest relates?

N/A.

Q.17 Do you have any views on whether there may, or may not, be under reporting of chance finds of treasure trove in Scotland? Please provide any information or evidence which can be advanced to support that position.

§98-99 Although the Society can offer no statistical data in substantiation it is of the opinion that the level of non-reporting in Scotland is substantial, based in part on the marked variation in the number of finds reported from across different parts of the country where similar population densities and land-use regimes apply. The Society is also aware of the experience under the Treasure Act and Portable Antiquities Scheme in England and Wales, where the number of finds reported increased dramatically once local finds officers were introduced and the Society is convinced the same would apply in Scotland. That being the case, it could be asserted that the Treasure Trove system in Scotland is failing in its obligation to safeguard portable antiquities for the nation.

Q.18 Are there any changes to the Code of Practice or the treasure trove processes which might encourage the reporting of chance finds?

The *Normand Report* (p.65) recommended ‘the appointment of Liaison Officers or Co-ordinators to be located around Scotland’ and the Society believes that implementation of this recommendation, or the consideration and implementation of alternative models of increased engagement, is long overdue and would achieve the single most beneficial improvement to the Treasure Trove system.

Q.19 Do you have any comments on the proposals in this section regarding miscellaneous and wider points?

§101-102 If the majority of chance finds are being dealt with within the 12-month period specified in the *Code* then the Society sees no great reason for concern about the few cases which for exceptional reasons take longer. If it is not the case that the majority are dealt with in this timeframe then the Society would assume this is another resourcing issue which could be resolved by increasing the frequency of SAFAP meetings and the number of TTU staff (or applying other management solutions such as re-prioritization of tasks). The Society would prefer that the 12-month timeframe be retained.

§104 The Society notes and applauds the commitment to the aspiration that the TTU will expand and would like to see that happening as soon as possible.

§105 The Society would support the inclusion of TTU at legal metal detecting rallies and would like to see this as the norm whenever such rallies take place.

§106 The proposal to hold a SAFAP meeting outwith Edinburgh each year is laudable in principle but would require careful planning and organization to maximise benefit and avoid criticisms of tokenism and unjustified expenditure.

§107-109 Agreed that publicity issues should be included within the *Code*, with the caveat that there is confidence that the TTU is sufficiently resourced to engage with and respond to the contacts as proposed.

§110-111 Agreed that Appendices H and I of the *Code* should be revised in the manner suggested.

§112-115 The Society is pleased to learn that the QLTR is in discussion with ALGAO: Scotland about excavation briefs and are convinced that greater rigour in the recovery and retention of appropriate archaeological finds is the way forward in addressing many of the problems which have arisen over assemblage composition.

This is by no means a simple issue, however, and ALGAO: Scotland don’t speak for all Local Authority archaeological services in Scotland, thus the Society would expect discussions to also include bodies such as the Sites & Monuments Records Forum, the IfA (including IfA Scotland), IfA Finds Group, FAME (Federation of Archaeological Managers & Employers), Society of Museum Archaeologists, and other involved parties. The Society would be happy to help and participate in these discussions. Importantly this and other issues raised here should be discussed with the Head of

Archaeology Strategy in Historic Scotland, who has been tasked by Government to develop a national archaeology strategy for Scotland.

§116 The Society understands the financial reasons for wanting to move to an online version of the revised *Code*. However, this is likely to be a substantial document, as was the 2008 *Code*, and difficult for many to absorb on screen. There are also publicity and promotional benefits for the Treasure Trove system to be gained in having hard copy, so the Society recommends a mixed approach in which hard copies are readily available when requested and are used by the TTU during outreach activities.

Q.20 Are there any other changes or improvements which you would like to see to the Code of Practice or the treasure trove processes; it would be helpful to have an explanation or illustration of the issue?

Two final points about the *Code* which are not mentioned in the review:

1. The Society would like to see the graphic design and illustrations in the *Code* changed and improved in order to make the document more attractive and increase its impact. This could also be carried through to the TT website, which is in need of a revamp.
2. The Society presumes that the two-track aspect of the process of submitting assemblages split between Historic Scotland and non-Historic Scotland grant-aided projects (*Code* p.13 and §6.3) owes its origin to the existence of the former Finds Disposal Panel. Does this two-track submission process still apply? If not it would simplify matters to amend the *Code* to show a single pathway for assemblage submission. The only caveat to this is whether the Historic Scotland box grant to museums for storing assemblages would be affected – if so then the two track aspect should be retained. Indeed the *Code* could encourage box grants to accompany all material claimed through the Treasure Trove process from various originators, and thus included in briefs and budgets for any archaeological project.

Please feel free to contact the Society at any time with regard to this and any other matter regarding Treasure Trove,

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alan Saville', written in a cursive style.

Alan Saville
President