Validation Review of the First Stage
HER Benchmarks in Wales

Rachel Edwards
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March 2010
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Validation Review of the First Stage HER Benchmarks in Wales

Rachel Edwards, Arboretum Archaeological Consultancy

1 Executive summary

1.1 The Review

1.1.1 The validation review of progress towards the First Stage HER Benchmarks in Wales was carried out by Arboretum Archaeological Consultancy. Extensive documentation was reviewed and discussed at a meeting with HER representatives, then detailed analysis resulted in a report of findings.

1.2 Progress towards First Stage HER Benchmarks for Wales

1.2.1 The Welsh regional HERs meet almost all the first stage HER Benchmarks for User Services and Access. The few benchmarks which have not quite been fully met are in progress or can be achieved without difficulty.

1.2.2 The first stage benchmarks for Information Coverage and Content have been achieved by all HERs in almost every case. The one area of concern is the position of the GGAT HER as repository for GGAT archaeological project archives.

1.2.3 The HERs have all achieved five of the eight first stage benchmark requirements for Information Management, and have mostly achieved the remainder. Whilst all now comply with relevant GIS standards, three HERs reported that older GIS data had not been compiled to modern standards, and so technically they are not fully compliant with Benchmark 3.3a. The HER reference collections had been listed and indexed by all (Benchmark 3.4a), but the GGAT archaeological project archives held in the HER are not catalogued. Whilst security copying or digitisation was identified by all as a priority, the ‘planned future provision’ required by the benchmark was less clear. No measures are currently in place for security copying the older GGAT project archives held in the HER.

1.2.4 All four HERs have achieved the minimum requirements of the first stage benchmarks for Organisation Management, however, all consider that funding for staff is insufficient to meet the level of service required for a regional HER.

1.2.5 All four regional HERs demonstrate clear commitment to the regular review of the policies and documents set out in the first stage HER Benchmarks.

1.3 Conclusion and recommendations

1.3.1 The validation review has concluded that whilst there are a few areas where work towards full compliance with the benchmarks is still ongoing, overall all four Welsh regional HERs have achieved the first stage HER Benchmark. GGAT HER is not
fully compliant with some of the benchmarks due to its role as repository for GGAT project archives.

1.3.2 Recommendations:

(i) Completion of the benchmark items which have been very nearly achieved.

(ii) Consideration of priorities for each HER and for Welsh regional HERs nationally in relation to
a) backlog, update, and enhancement tasks,
b) digitisation/security copying of non-digital material,
c) retrospective updating of GIS metadata.
2 Introduction

2.1 Context and background

2.1.1 The validation review of progress towards the First Stage HER Benchmarks in Wales was carried out by Arboretum Archaeological Consultancy in February and March 2010.

2.1.2 The project brief set out the context for the validation review of the first stage HER Benchmarks in Wales:

‘In 2004 the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW), on the recommendation of the Committee for the Strategic Framework for Historic Environment Records in Wales, agreed to target SMR grant aid at the achievement of the first stage of ALGAO and English Heritage’s draft benchmarks for HERs (October 2002 version). Following discussion between the Royal Commission and the four Welsh Archaeological Trusts in September 2004 slight changes were made to the existing document to reflect requirements in Wales. These formed addenda to the original document.

By the end of March 2007 the majority of the benchmark work had been completed to stage 1 level, though the data standards and systems section could not be completed as all four trusts were undergoing a review of their systems with a view to commissioning a new HER application. By 2009 the new system was in place and during 2009–10 the HERs reviewed their documentation and updated where necessary.’

2.1.3 The project consisted of an external review of the four Welsh HERs to validate whether or not the first stage of ALGAO and English Heritage’s draft HER Benchmarks with addenda for Wales have been achieved (EH and ALGAO 2002; benchmarks and addenda reproduced as Appendix 1).

2.1.4 This review was commissioned by RCAHMW in February 2010 in accordance with a Project Design (dated 17 February 2010). The review aimed to

(i) Provide an independent validation of progress by each of the four HERs towards the Benchmarks.

(ii) Highlight areas where the first stage Benchmark has not been achieved and make recommendations for further work if necessary.

2.1.5 Representatives of the four HERs have commented on the validation of benchmarks for their area. A draft of this report was submitted to David Thomas of RCAHMW on 19 March 2010. Comments by the HERs and RCAHMW have been incorporated in this report.

2.2 The four Welsh regional HERs

2.2.1 The role of the HERs is set out in the Welsh Archaeological Trusts’ position paper (WAT 2008), as follows: ‘The four regional Historic Environment Records, curated by the WATs, and held in separate charitable Trusts [since 2008], gather, record
and make available information on the historic environment of Wales. The HERs, which have been developed over a period of over thirty years, currently contain information on over 243,000 sites, landscape areas and events, a number which is increasing at a rate of between 5–10% per annum. They are the primary source of information on all aspects of the local historic environment of Wales, and act as a tool for recording the on-going process of its interpretation, conservation and management. They underpin all the activities of the WATs, and they are also vital to the work of others who have a role in the investigation and management of the historic environment in Wales.’

2.2.2 The four regional HERs are:

- **Clwyd-Powys HER** (maintained by the Clwyd-Powys Archaeological Trust) – Denbighshire, Flintshire, Wrexham, Powys, part of the Brecon Beacons National Park, and the eastern part of Conwy.

- **Dyfed HER** (maintained by the Dyfed Archaeological Trust) – Pembrokeshire, Carmarthenshire, Ceredigion, Pembrokeshire Coast National Park and part of the Brecon Beacons National Park

- **Gwynedd HER** (maintained by Gwynedd Archaeological Trust) – Isle of Anglesey, Gwynedd, Snowdonia National Park, and the western part of Conwy.

- **Glamorgan-Gwent HER** (maintained by the Glamorgan-Gwent Archaeological Trust) – Swansea, Neath Port Talbot, Rhondda Cynnon Taf, Bridgend, The Vale of Glamorgan, Cardiff, Merthyr Tydfil, Caerphilly, Blaenau Gwent, Monmouthshire, Torfaen, Newport, and part of Brecon Beacons National Park.

2.2.3 HERs today are computerised records supported by a range of digital and non-digital reference material. In Wales, a bespoke web-based software platform with integral GIS has been developed, which is used by all the regional HERs. This has enabled a pan-Wales approach to remote administration, management, compilation and validation of the computerised record (WAT 2008). Public internet access to all four HERs will be available in the near future as ‘Archwilio’.

2.3 The HER Benchmarks

2.3.1 Measures of HER performance were first published in draft form by English Heritage and ALGAO in 2002 (EH and ALGAO 2002), arising from a project carried out on their behalf by Gill Chitty. The purpose of the project was to produce a draft policy document to provide a definition and standard for Sites and Monuments Records in England and an outline standard and framework for future development of more highly developed Historic Environment Records. The draft HER Benchmarks (see Appendix 1) have not been adopted formally in England, but in Wales are embedded in the development of the four regional HERs.

2.3.2 The 2002 benchmarks refer back to a report by David and Evelyn Baker (Baker and Baker 1999) assessing the state of development of English Sites and Monuments Records for ALGAO. This identified great variability across the country in all aspects of SMRS – management context, system organisation, information content, system use, and quality assurance.
2.3.3 The benchmarks and the guidelines for SMRs *Informing the Future of the Past* (Fernie and Gilman 2000) established a baseline for SMRs and HERs. Then and later, in 2004, many Records in England were found to be significantly below the benchmark level (Baker *et al* 2004). It is important, therefore, to recognise the very considerable achievement of the staff of the Welsh SMRs – now HERs – over the past years in progressing to the level of the first stage HER Benchmark, supported by the funding and integrated management regime in Wales provided by Cadw and RCAHMW.

### 3 Methods

#### 3.1 Methods

3.1.1 The project collected and evaluated information relating to the four Welsh HERS.

- Benchmark documentation from all four of the Welsh HERs was collated and an initial review was undertaken.
- A meeting was held with representatives of all four Welsh Archaeological Trusts and the Royal Commission. This allowed clarification of issues raised by the initial review.
- A detailed review and analysis of the Benchmark documentation was carried out.
- HERs were contacted by telephone and email to discuss the findings of the validation and to seek clarification of any issues.
- This report was compiled, summarising progress by each of the four HERs towards the Benchmarks, highlighting areas where the Benchmark has not been achieved, and making recommendations for further work if necessary.

### 4 Results

#### 4.1 Introduction

4.1.1 The progress of each HER towards the First Stage HER Benchmarks for Wales is summarised in Appendix 2. The assessment of whether benchmarks have been fully achieved, mostly achieved, or partly achieved requires careful judgment in some cases. Some benchmarks are clear cut and easy to assess, and others are less so. The assessment acknowledges the original purpose of the first stage benchmarks, as minimum standards for Historic Environment Records, which were regarded as quite difficult to achieve for many SMRs at the time. In some cases, advances in technology, eg developments in software and GIS, can lead to the assumption that a higher standard is required than would appear to have been the original intent.

4.1.2 Comments on each of the four groups of benchmarks follow.
4.2 User Services and Access

4.2.1 All four HERs have produced the policies required in this section of the Benchmarks – the information services policy, and the policy on provision of services in Welsh (Benchmarks 1.1a and 1.5a).

4.2.2 All provide appropriate access to services (Benchmark 1.2a). Information about access to services on each of the WAT websites is clear and easily available, the only non-compliance issue was that the opening hours for DAT were not published on the website. This has now been noted and will be corrected as soon as practicable.

4.2.3 Appropriate information on each HER is available through HEIRNET (part of Benchmark 1.2a). Any difficulties with finding this information is due to the way in which HEIRNET indexes information about HERs.

4.2.4 In each case the HER provides a supervised access area for visitors (part of Benchmark 1.2a). CPAT premises are inaccessible for visitors who cannot use stairs, but this is clearly publicised, and postal or email searches are offered where physical access may be a problem. Response times to enquiries are published. Remote access to the record for all Welsh HERs will become available shortly with the introduction of Archwilio.

4.2.5 The benchmark requirement for a leaflet detailing access to services was not fully achieved by all (part of Benchmark 1.2a). GGAT has an up-to-date leaflet and poster which are soon to be revised, DAT and GAT are in the process of revising existing leaflets, and GAT HER is included in the general Trust leaflet. CPAT HER was included in a somewhat dated general Trust leaflet. At a time when significant changes to the HERs’ services are not yet complete, the lack of up-to-date leaflets is not seen as a significant failing.

4.2.6 All conduct research into user profiles and satisfaction (Benchmark 1.3a).

4.2.7 The development of the Archwilio online access to the HERs was considered to be the principal element of the outreach programme for all (Benchmark 1.4a). In addition, each HER contributes to outreach carried out by the WATs, and in some cases HER-specific outreach also takes place. Whilst the benchmark is considered to have been met, it was noted that limited resources can make it difficult for the Welsh HERs to develop the balanced programmes of outreach set out in the benchmark.

4.3 Information Coverage and Content

4.3.1 In all cases the HERs have developed written information policies in line with Benchmark 2.1a.

4.3.2 The coverage of all four HERs meets the standard for information coverage and content identified in Benchmark 2.2a.

4.3.3 All four HERs have policies relating to the deposition of primary archive material with an appropriate repository (Benchmark 2.3a). A distinction can be made between HER primary material and archaeological archives, definitions of which...
are reproduced in Appendix 3 below. Museums are now generally regarded as ‘the primary location for archaeological archives’ (Gilman and Newman 2007, A22). The Welsh HERs have different roles in relation to archaeological archives generated by their WATs. GAT HER has no role in relation to archaeological archives of GAT as a whole. DAT HER regularly receives DAT archaeological archives, but transfers these on to an appropriate repository. GGAT HER holds archaeological archives from GGAT projects, as described in the statement reproduced in Appendix 3. Although the GGAT HER has and does transfer some archaeological archives to other repositories, the HER retains a significant responsibility for a number of older archives, including some which are not ordered or catalogued or resourced. If these archives are regarded as part of the HER, this compromises GGAT HER’s achievement of some of the HER Benchmarks.

4.3.4 Security copying and safe storage of HER primary archive material is an issue for all, cf Benchmark 3.5a, discussed below.

4.4 Information Management

4.4.1 Each HER has a written manual in accordance with Benchmark 3.1a. As the new HER software and GIS is a recent development, the relevant new manuals are still in preparation, but this has clearly been seen as a priority.

4.4.2 A detailed table listing compliance of all database fields with the relevant data content standards (Benchmark 3.2a) was prepared by the GGAT HER Officer, and this covers the web-based system now in use by all four HERs. This has been used to create a detailed compliance table for GAT.

4.4.3 The new HER system used by all four HERs incorporates a GIS and complies with the relevant national standards (Benchmark 3.3a). Three of the four – CPAT, DAT, and GAT – noted that data recorded before the development of national standards for GIS, especially GIS metadata, were not necessarily compliant. Updating earlier records is being included in future work programmes where possible. In some cases it is not known at what scale spatial data were captured, and therefore the metadata cannot be recorded in full.

4.4.4 All provided guides to supporting reference collections held by their HER (Benchmark 3.4a). The first stage benchmark requirement for A written guide and index to supporting reference collections held by the Record was taken to mean a list of the reference collections, together with some form of index or list for each, eg the volume numbers for a particular journal. Cross-indexing of reference collections with the computerised record is a second stage benchmark requirement. The HER reference collections had been listed and indexed by all. Although GGAT HER has achieved the benchmark in relation to the HER reference collections, the GGAT archaeological project archives held in the HER are not catalogued and their contents are unknown.

4.4.5 Data security for the HER and for other digital databases and sources was comprehensive in all cases (Benchmark 3.5a). The issue of security copying non-digital material was more of a challenge. Whilst this was identified by all as a current and future priority, definite ‘planned future provision’ of security copying was less clear.
4.4.6 Each HER had completed a detailed information audit in 2005–06, due for review in 2010–11 (Benchmark 3.6a).

4.4.7 All have carried out assessments of backlog, update and enhancement requirements (Benchmark 3.7a), and in some cases the assessments made as part of the 2005–06 information audits have been periodically updated. Prioritised programmes for work on backlog, update, and enhancement tasks form part of the HER forward plans (Benchmark 4.4a). In all cases the work required to complete these tasks is significant. How to approach backlog, update, and enhancement is a difficulty faced by all SMRs and HERs in the UK, and this is acknowledged in the original benchmarks, which identified the need for national guidelines on this issue.

4.4.8 Each HER has a risk assessment and an emergency preparedness plan in place (Benchmark 3.8a), in conjunction with the host WAT. Regular updates to these documents have been made.

4.5 Organisation Management

4.5.1 All HERs have the appropriate service level agreements in place with the relevant local planning authorities covering formal adoption, geographical coverage, and service levels (Benchmarks 4.1a and 4.2a). As regional HERs there is mutual agreement over geographical coverage across Wales, and with National Parks. As members of the END partnership there are agreements in place covering information exchange (ENDEX).

4.5.2 A combined position statement for all four HERs is in place, which fulfils the requirement of Benchmark 4.3a (WAT 2008).

4.5.3 Each HER has a forward plan in place, with a timetable for review (Benchmark 4.4a). All note that limited resources mean that it is difficult to achieve the aims set out in forward plans.

4.5.4 In each case the HER has a ‘at least one full-time member of staff with appropriate qualifications and experience’ (Benchmark 4.5a). However, all consider that the current staffing provision is not commensurate with the level of service required.

4.5.5 All report appropriate internal management arrangements including administrative and clerical support (Benchmark 4.6a).

4.5.6 An IT support agreement for the HER software and GIS is due to be signed shortly (Benchmark 4.7a). In each case the WATs provide appropriate IT hardware and software support. RCAHMW provides archive support to the HERs.

4.5.7 Appropriate arrangements for training and CPD are in place for each HER (Benchmark 4.8a). All WATs are IfA Registered Organisations, which requires a commitment to CPD, and all except GAT have training plans in place. GAT provides sufficient and appropriate training but does not operate an overall training plan.
5 Conclusions and recommendations

5.1 Progress towards First Stage HER Benchmarks for Wales

5.1.1 The Welsh regional HERs meet almost all the first stage HER Benchmarks for User Services and Access and those which have not been fully met are in progress or can be achieved without difficulty.

5.1.2 The first stage benchmarks for Information Coverage and Content have been achieved by all HERs in almost every case. The one area of concern is the position of the GGAT HER as repository for GGAT archaeological project archives. If these archives are regarded as part of the HER, this compromises GGAT HER’s achievement of some of the HER Benchmarks.

5.1.3 The HERs have all fully achieved five of the eight first stage benchmark requirements for Information Management, and mostly achieved the remainder. Whilst all now comply with the relevant standards for GIS, three HERs reported that older GIS data still in use had not been compiled to modern standards, and so technically they are not fully compliant with Benchmark 3.3a. The HER reference collections had been listed and indexed by all (Benchmark 3.4a), but the GGAT project archives held in the HER are not catalogued. Whilst security copying was identified by all as a current and future priority, definite ‘planned future provision’ was less clear. No measures are currently in place for security copying the older GGAT project archives held in the HER.

5.1.4 All four HERs have achieved the minimum requirements of the first stage benchmarks for Organisation Management, however, all consider that funding for staff is insufficient to meet the level of service required for a regional HER.

5.1.5 All four regional HERs demonstrated clear commitment to the regular review of the policies and documents set out in the first stage HER Benchmarks.

5.2 Recommendations

5.2.1 Completion of the benchmark items which have been very nearly achieved.

5.2.2 Consideration of priorities for each HER and for Welsh regional HERs nationally in relation to a) backlog, update, and enhancement tasks, b) digitisation/security copying of non-digital material, c) retrospective updating of GIS metadata.

5.3 Conclusion

5.3.1 The validation review has concluded that whilst there are a few areas where work towards full compliance with the benchmarks is still ongoing, overall all four Welsh regional HERs have achieved the first stage HER Benchmark. GGAT HER is not fully compliant with some of the benchmarks due to its role as repository for GGAT project archives.

5.3.2 What was impressive about each of the Welsh regional HERs was their commitment to the purpose of an HER, to providing ‘access to a comprehensive and dynamic information resource about the historic environment of its local area for public benefit and use.’ (EH and ALGAO 2002, 4). Whilst achievement of some
of the benchmarks can seem a bureaucratic exercise, when combined together, the benchmarks provide the foundations for a Record which can indeed be described as a comprehensive and dynamic resource.

6 Acknowledgments

Arboretum Archaeological Consultancy would like to thank David Thomas for his help and support throughout the project. The representatives of the four HERs, Charina Jones, Marion Page, Jeff Spencer and Nina Steele were helpful and cooperative in every way. The report was edited by Hal Dalwood.

7 Abbreviations

ALGAO Association of Local Government Archaeologists
Baker rec Recommendation made in Baker and Baker 1999
CPAT Clwyd-Powys Archaeological Trust
CPD Continuing Professional Development
DAT Dyfed Archaeological Trust
EH English Heritage
END Extended National Database Partnership for Wales
ENDEX Extended National Database Exchange
GAT Gwynedd Archaeological Trust
GGAT Glamorgan-Gwent Archaeological Trust
GIS Geographic Information System
HEIRNET Historic Environment Information Resources Network
HER Historic Environment Record
IfA Institute for Archaeologists
NMR National Monuments Record
RCAHMW Royal Commission on the Ancient and Historical Monuments of Wales
SMR Sites and Monuments Record
WAT Welsh Archaeological Trust(s)
8 References


Baker, D, Chitty, G, and Edwards, R, 2004 Resource needs for SMRs and UADs to reach the first stage benchmarks. Swindon: English Heritage


Fernie, K, and Gilman P (eds), 2000. Informing the Future of the Past: Guidelines for SMRs, English Heritage


WAT 2008 Strategic Framework for Historic Environment Records in Wales – Welsh Archaeological Trusts’ position paper
### Appendix 1 Benchmarks for Good Practice 2002 including addenda for Wales

<table>
<thead>
<tr>
<th>1. User Services and Access</th>
<th>1(^{st}) stage HER performance measures</th>
<th>2(^{nd}) stage HER performance measures</th>
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<tbody>
<tr>
<td><strong>SERVING USER NEEDS</strong></td>
<td>1.1 Information services policy</td>
<td>1.1b A developed information services policy based on research into patterns of usage and user satisfaction (1.3a/b.). Specific consideration should be given to provision for access for different types of user and their particular needs.</td>
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<tr>
<td></td>
<td><em>Baker Rec 20, 41</em></td>
<td><em>Draft National Standard for Access to Archives (Public Service Quality Group)</em></td>
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<tr>
<td></td>
<td>1.1a. A written policy for information services setting out:</td>
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<td></td>
<td>• The purposes for which the historic environment record is maintained</td>
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<td></td>
<td>• The professional and public user groups that it aims to serve</td>
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<td></td>
<td>• The arrangements for providing information and access for those users according to their particular needs.</td>
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<td><em>IFP Guidelines E.1-3</em></td>
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<tr>
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<td><em>Draft National Standard for Access to Archives (Public Service Quality Group)</em></td>
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<td>1.2 Access to services</td>
<td>1.2 Access to services</td>
<td>1.2b. A dedicated, supervised work area for researchers, appropriately equipped. Developed provision for remote access via intranet (between and within organisations) or internet:</td>
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<td></td>
<td><em>Baker Rec 41</em></td>
<td>e.g. online access to high level data through a catalogue (e.g. Greater London with ADS) or fully mounted on own site (e.g. Durham)</td>
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<td></td>
<td>1.2a. Publication of details of public access and search facilities (remote and / or local), including opening hours and charging policy in</td>
<td>e.g. Fully mounted interoperable system accessible through gateway / portal such as HEIRPORT</td>
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<td></td>
<td>• printed leaflet/poster,</td>
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<td></td>
<td>• Web site/ page with email address</td>
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<td></td>
<td>• Index entry in HEIRNET Register.</td>
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<td>User facilities, according to local policy (1.1a), should include a supervised work area for researchers, appropriately equipped and with facilities for copying, etc. Where such facilities are limited, there should be an appropriate alternative provision such as a specified level of response to postal, telephone and email enquiries and / or remote access to the Record via other services (e.g. from terminals in museums, libraries, record offices).</td>
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<td><em>IFP Guidelines E.3-4</em></td>
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<tr>
<td><strong>SATISFYING USER NEEDS</strong></td>
<td>1.3 Research into user profiles and service satisfaction</td>
<td>1.3b. Systematically collected information on user satisfaction. Market research into the profile and information needs of identified user groups; and into awareness and needs among potential new user groups, such as schools and educational organisations</td>
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<td><em>Baker Rec 38,39</em></td>
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<td>1.3a. A maintained record of users and type of enquiry for both local and remote use (e.g. web hits, telephone enquiries, as well as visits by researchers).</td>
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<td><em>IFP Guidelines E.2, Panel 7</em></td>
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<tr>
<td><strong>REACHING NEW AUDIENCES</strong></td>
<td>1.4 Development of outreach</td>
<td>1.4b. Developed programme of outreach activities based on user responses and market research (above 1.3a. and b.). Resources for use in education should be a priority. These might range from new media and data formats (for presentation of interpreted information for specific user groups / topics e.g. through NGFL) to exhibitions, leaflets, trails, open days, field programmes, etc.</td>
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<td><em>Baker Rec 1</em></td>
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<td>1.4a. Programme of outreach activities to develop new audiences and promote wider use of resources; or outline proposals for how a balanced programme will be developed in the future.</td>
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<td><em>IFP Guidelines E.6</em></td>
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<td>1.4b. Developed programme of outreach activities based on user responses and market research (above 1.3a. and b.). Resources for use in education should be a priority. These might range from new media and data formats (for presentation of interpreted information for specific user groups / topics e.g. through NGFL) to exhibitions, leaflets, trails, open days, field programmes, etc.</td>
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1.5 (Wales) Provision of services through the medium of Welsh.

1.5a (Wales) A statement about the policy for providing an information service in Welsh.

1.5b (Wales) Adoption of a formal Welsh Language Policy ratified by the Welsh Language Board.

## 2. Information Coverage and Content

<table>
<thead>
<tr>
<th>INFORMATION CONTENT</th>
<th>1st stage HER performance measures</th>
<th>2nd stage HER performance measures</th>
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<tbody>
<tr>
<td>2.1 Information policy</td>
<td>2.1a. A written policy setting out the scope, geographical coverage and content of information resources that should be accessible through the service (digital, non-digital and reference collections). The policy should take account of related historic environment information systems, museum, library and record office collections that complement the Record's holdings. In principle, the Record should be inclusive of subject and period for all archaeology, terrestrial and maritime, either through its own holdings or links with related information resources. In practice, the circumstances of its development and resources may mean that the Record is not all-inclusive. The policy should be explicit about differential coverage in period and topic and selective inclusion or omissions (e.g. cut-off dates, datasets from thematic surveys). The policy will include a statement of existing arrangements for exchanging or sharing data and networking systems with related local records and other information providers / originators. This will also cover licence agreements (e.g. with NMRW) and a statement on IPR issues.</td>
<td>2.1b. A written policy setting out the extended scope, coverage and content of information resources, including historic buildings and areas, developed through consultation and agreements with partner authorities, specialist user groups and other historic / local environment information systems serving the same geographical area (see 3.6b.). Coverage should be aim to be inclusive of subject and period for all archaeology and aspects of the historic environment (e.g. HLC, historical ecology datasets, historic buildings and areas) including standardised arrangements for updating information.</td>
</tr>
<tr>
<td>Baker Rec 19, 23, 28, 29</td>
<td>IFP Guidelines B.4, C, E.4.4</td>
<td></td>
</tr>
<tr>
<td>2.2 Information coverage and content</td>
<td>2.2a. The coverage of an HER, in accordance with its information policy, should include units of information compiled from the sources outlined in detail in IFP Guidelines (D.3 - 5). It should provide comprehensive coverage for statutorily and non-statutorily designated historic places in its area through its own data holdings or linkages to others. A draft minimum content standard is appended at Annex 1: HER Basic compliance specification DRAFT v0.2.</td>
<td>2.2b. Enhanced coverage based on consultation and agreements about shared data holdings within the authority and with partner authorities and information resources, typically including:</td>
</tr>
<tr>
<td>Baker Rec 28</td>
<td>IFP Guidelines B.5-7, D.3-5</td>
<td>• additional heritage data sets, e.g. for ‘local list’ buildings, historical ecology</td>
</tr>
<tr>
<td>2.3 Primary or unique archive material should be managed by an appropriate curatorial service.</td>
<td>2.3a. Primary archive (digital, non-digital and finds) should be deposited with an appropriate repository. A disposals policy for staged transfers may be required and security copying</td>
<td>• integrated, pan-authority GIS with historic building, landscape and natural environment information layers,</td>
</tr>
<tr>
<td>Baker Rec 33</td>
<td></td>
<td>• networked arrangements for shared access to distributed systems,</td>
</tr>
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<td></td>
<td></td>
<td>• collaborative projects creating multi-disciplinary information resources with libraries, museums and record offices.</td>
</tr>
</tbody>
</table>
### 3. Information Management

<table>
<thead>
<tr>
<th>SYSTEM ORGANISATION AND PROCEDURES</th>
<th>1(^{st}) stage HER performance measures</th>
<th>2(^{nd}) stage HER performance measures</th>
</tr>
</thead>
</table>
| 3.1 Formally adopted procedures for documentation practice **Baker Rec 44** | **3.1a.** Written manual or ‘recording guidelines’ to provide quality assurance and documenting 3.2a. - 3.5a. **IFP Guidelines B.5 - B.7, C.** | **3.1b.** Extended written manual for procedures to cover the range of historic environment information systems with which the Record shares data or has links.  
- Adoption of full procedural standard (e.g. equivalent to SPECTRUM for museums) for which documentation may be developed in next 5 years. |
| 3.2 Computerised database(s) and relevant information schemes compiled in accordance with national data standards. **Baker Rec 3, 31** | **3.2a (Wales) Compliance with a basic MIDAS data content standard, as applicable in Wales and agreed through the END Partnership; conformity with INSCRIPTION wordlists and thesauri and, where relevant, specific terminologies in use in Wales and agreed through the END Partnership.** | **3.2b.** Compliance with developing standards for historic environment data content and information schemes:  
- extended Dublin Core scheme for historic environment data  
- a standard / guidance for hierarchical data models  
- an information scheme for building and landscape management records |
| 3.3 GIS for current and historical mapping, linked to the Record databases. **Baker Rec 31, 15** | **3.3a. (Wales) Compliance with national standards for spatial data and guidance on GIS good practice as applicable in Wales and agreed through the END Partnership, e.g. ADS GIS Guide to Good Practice Guide, NGDF metadata standard.** | **3.3b.** Extended procedural manual for documentation practice to support a developed GIS system for integrated management of spatial and map-based data for historic environment, linked to databases and text-based information.  
Compliance with developing standards for GIS data content and protocols for exchanging and sharing GIS data:  
- a standard for core historic environment spatial data and recording scheme. |
| 3.4 Supporting reference collections (secondary sources, maps, graphic and photographic material) **Baker Rec 32** | **3.4a.** A written guide and index to supporting reference collections held by the Record. Collections should be housed and maintained to relevant environmental and storage standards. **IFP Guidelines B.11-12.** | **3.4b.** A catalogue of reference collections, cross-indexed with the computerised Record. Forward plan programme for enhancing and digitising reference collections such as historic maps, photographs and other material indexed in the Record. |
| **QUALITY AND SECURITY MEASURES** | | |
| 3.5 Data security **Baker Rec 43, 44** | **3.5a.** System security policy covering arrangements, or planned future provision, for  
- storage and handling of digital and other modern media;  
- multi-layered security procedures;  
- long-term digital archiving and security copying of non-digital material. **IFP Guidelines B.9.2** | |
### 3.6 Information audit on quinquennial basis
*Baker Rec 14*

- **3.6a.** Report of information audit to assess the quality of data and identify the need for validation and enhancement.
  - *NMR SMR data audit specification: section 6*

- **3.6b.** Repeat audits on a quinquennial cycle.

### 3.7 Data validation and currency:
*Baker Rec 42*

- **3.7a.** An assessment of backlog, update and enhancement requirements. A prioritised programme, based on the results of an information audit (3.6a.), for data validation, recasting of earlier records, essential core data indexing, routine updating and enhancement projects should form part of the Record's Forward Plan. **National Guidelines needed.**
  - *IFP Guidelines D.3-5*

- **3.7b.** Cleared backlogs of data validation and core data entry; implementation of a programme for new data capture to maintain and extend core data sets as appropriate. There should be a phased programme of enhancement forming part of the Record's Forward Plan (see 3.4b.)
  - *IFP Guidelines D.4-5*

### 3.8 Safeguards against foreseeable risks and disaster
*Baker Rec 44*

- Risk assessment and emergency preparedness plan
  - *IFP Guidelines B.12*

### 4. Organisation

#### Management

**CORPORATE AND BUSINESS ARRANGEMENTS**

- **4.1.** Formal adoption as a maintained public information resource for understanding and enjoyment of the local historic environment.
  - *Baker Rec 18*

- **4.2.** Formal agreement on geographical coverage and service levels with partners / service providers.
  - *Baker Rec 7, 22, 28*

- **4.3.** Statement of purpose or mission statement, policies and key aims of the service.
  - *Baker Rec 30*

- **4.4.** Forward Plan supported by appropriate budgetary provision
  - *Baker Rec 26, 30*

**STAFFING AND SUPPORT SERVICES**

- **4.5.** Professional archaeological / historic environment officer post with primary responsibility for managing the Record
  - *Baker Rec 24(a)*

#### 1st stage HER performance measures

- 4.1a. i. Resolution of governing body to adopt the Record formally, in accordance with the 'Benchmark' Scheme.

- 4.1a. ii. Where the governing body is not the local planning authority (lpa), or acts on behalf of one or more local authorities, formal recognition of the Record is desirable from the relevant lpas. This might, for example, be incorporated in service level agreements.

- 4.2a. Resolution of governing body; service level agreements and contracts.

- 4.3a. Formally adopted policies and strategic plan for the service.
  - *IFP Guidelines B.2*

- 4.4a. Forward plan for the service to achieve implementation of programmes and projects identified in Section 1-3, indicating the resources secured and required for the plan period (3 year recommended).
  - *IFP Guidelines B.2*

- 4.5a. (Wales) Staffing provision and structure commensurate with the level of services provided. This will include at least one full-time member of staff with appropriate qualifications and experience.

#### 2nd stage HER performance measures

- Annual review of service level agreements.

- Annual review of Forward Plan.

- Annual review of Forward Plan.

- Annual review of Forward Plan.

- Staffing provision and structure commensurate with the level of services provided. This will include personnel with qualifications, experience, and membership of relevant professional bodies, as appropriate for managing an extended range of historic environment information resources (as outlined in 2.2)
  - *IFP Guidelines B.3*
<table>
<thead>
<tr>
<th>4.6 Appropriate internal management arrangements, in relation to the organisation's overall structure, including administrative and clerical support. <strong>Baker Rec 24(a)</strong></th>
<th>4.6a. Organisation 'management tree' illustrating arrangements for administrative and clerical support for the service.</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.7 Technical advice: system support for IT and access to other relevant professional advice on archive and records management <strong>Baker Rec 24(a)</strong></td>
<td>4.7a (Wales) Provision for identified IT support and arrangements for obtaining advice on management of archive and primary records from a professional archivist.</td>
</tr>
<tr>
<td>4.8 Staff training and development programme and resources <strong>Baker Rec 27</strong></td>
<td>4.8a. Organisation training plan showing commitment to CPD and formal review process for training and development of staff. There should be budgetary provision for relevant specialist and software training courses. Training plans should also be in place for student and volunteer placements <strong>IFP Guidelines B.3</strong></td>
</tr>
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</table>
Appendix 2 Progress by the Welsh HERs towards the first stage HER Benchmarks for good practice

<table>
<thead>
<tr>
<th>Bench-mark</th>
<th>Item</th>
<th>CPAT</th>
<th>CPAT details</th>
<th>DAT</th>
<th>DAT details</th>
<th>GAT</th>
<th>GAT details</th>
<th>GGAT</th>
<th>GGAT details</th>
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<tbody>
<tr>
<td></td>
<td>1 User Services and Access</td>
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<tr>
<td></td>
<td>1.1 Information services policy</td>
<td>Achieved</td>
<td>Policy provided</td>
<td>Achieved</td>
<td>Comprehensive policy provided</td>
<td>Achieved</td>
<td>Policy provided</td>
<td>Achieved</td>
<td>Policy provided</td>
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<tr>
<td></td>
<td>1.2 Access to services:</td>
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<tr>
<td></td>
<td>Leaflet</td>
<td>Partly achieved</td>
<td>No current leaflet/poster; old CPAT leaflet provided</td>
<td>Achieved</td>
<td>Current leaflet in use, revised version being prepared</td>
<td>Achieved</td>
<td>Revised leaflet being prepared. GAT leaflet includes HER</td>
<td>Achieved</td>
<td>Leaflet and poster, current, to be updated for new system</td>
</tr>
<tr>
<td></td>
<td>Web page</td>
<td>Achieved</td>
<td>Checked 10/3/10</td>
<td>Mostly achieved</td>
<td>Checked 10/3/10 – useful and comprehensive web pages, but can't find opening hours. 19/3/10 Opening hours will be added to website when next amendments made.</td>
<td>Achieved</td>
<td>Checked 11/3/10</td>
<td>Achieved</td>
<td>Checked 15/3/10</td>
</tr>
<tr>
<td></td>
<td>HEIRNET</td>
<td>Achieved</td>
<td>Checked 10/3/10</td>
<td>Achieved</td>
<td>Confusing, as listed as 'Carmarthenshire, Ceredigion and Pembrokeshire Sites and Monuments Record (SMR)' HEIRNET problem with how resources are listed and searched. Updated information has been submitted by DAT.</td>
<td>Achieved</td>
<td>Checked 11/3/10</td>
<td>Achieved</td>
<td>Checked 15/3/10</td>
</tr>
<tr>
<td>Bench-mark</td>
<td>Item</td>
<td>CPAT</td>
<td>CPAT details</td>
<td>DAT</td>
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<tr>
<td>Supervised access area/response /remote access</td>
<td>Achieved</td>
<td>No disabled access, but this is clear in information about HER. HER data provided by post/email where physical access is a problem.</td>
<td>Achieved</td>
<td>See policy 1.1, website</td>
<td>Achieved</td>
<td>See policy 1.1, website</td>
<td>Achieved</td>
<td>See policy 1.1, website</td>
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<tr>
<td>1.3</td>
<td>Research into user profiles and service satisfaction</td>
<td>Achieved</td>
<td>Summary from Annual Report and statement about enquiry database</td>
<td>Achieved</td>
<td>Database provided. Visitors and user satisfaction analysed, see 1.1</td>
<td>Achieved</td>
<td>Enquiry database is maintained. See policy 1.1. User survey questionnaire provided.</td>
<td>Achieved</td>
<td>Enquiry database is maintained. See policy 1.1. User survey questionnaire available from website.</td>
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<tr>
<td>1.4</td>
<td>Development of outreach</td>
<td>Achieved</td>
<td>Information provided on HER input to CPAT outreach. Archwilio is main element of future programme</td>
<td>Achieved</td>
<td>DAT outreach policy provided; HER central part of this. Statement on recent &amp; future outreach. Archwilio is main element of future programme</td>
<td>Achieved</td>
<td>HER outreach is part of overall GAT outreach, includes HER-specific events/talks. Archwilio is main element of future programme</td>
<td>Achieved</td>
<td>No written programme. Annual programme of HER outreach activities in place commensurate with current levels of funding. However, the HER is used in many of the Trust’s other outreach programmes and events. Archwilio is main element of future programme</td>
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<tr>
<td>1.5</td>
<td>Provision of services through the medium of Welsh.</td>
<td>Achieved</td>
<td>Policy provided</td>
<td>Achieved</td>
<td>Policy provided</td>
<td>Achieved</td>
<td>Policy provided</td>
<td>Achieved</td>
<td>Policy provided</td>
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<table>
<thead>
<tr>
<th>2 Information Coverage and Content</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1</td>
</tr>
<tr>
<td>2.2</td>
</tr>
<tr>
<td>Bench-mark</td>
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<tr>
<td>2.3</td>
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### 3 Information Management

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</thead>
<tbody>
<tr>
<td>3.2</td>
<td>Computerised database(s) and relevant information schemes compiled in accordance with national data standards</td>
<td>Achieved</td>
<td>Statement in 3.1, and see GGAT detailed compliance table</td>
<td>Achieved</td>
<td>Statement in 3.6, and see GGAT detailed compliance table</td>
<td>Achieved</td>
<td>Detailed compliance table based on GGAT version. Two fields to be added to the tables to cover positional accuracy and organisation name. Mandatory 'type' field not required for bibliographic refs, though it would be for archives.</td>
<td>Achieved</td>
<td>Detailed compliance statement which effectively covers all four HERs. Two fields to be added to the tables to cover positional accuracy and organisation name. Mandatory ‘type’ field not required for bibliographic refs, though it would be for archives.</td>
</tr>
<tr>
<td>3.3</td>
<td>GIS for current and historical mapping, linked to the Record database</td>
<td>Mostly achieved</td>
<td>In 3.1; see also GGAT doc 3.3a. Few metadata issues, but basically compliant.</td>
<td>Mostly achieved</td>
<td>Separate statement on GIS data standards. Compliant for GIS since MIDAS Heritage published, retrospective compliance where possible will be included in prioritised programmes of work.</td>
<td>Mostly achieved</td>
<td>Compliant for newer data. Programme of enhancement in place for older datasets where this can be achieved.</td>
<td>Achieved</td>
<td>Comprehensive metadata compliance statement.</td>
</tr>
<tr>
<td>Bench-mark</td>
<td>Item</td>
<td>CPAT</td>
<td>CPAT details</td>
<td>DAT</td>
<td>DAT details</td>
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<tr>
<td>3.4</td>
<td>Supporting reference collections (secondary sources, maps, graphic and photographic material)</td>
<td>Achieved</td>
<td>Written guide provided as 3.4a</td>
<td>Achieved</td>
<td>See 3.4 index and 3.4 guide</td>
<td>Achieved</td>
<td>Comprehensive guide provided as 3.4a</td>
<td>Achieved for HER reference collection Not achieved for GGAT project archives</td>
<td>Main HER reference collections are indexed. Further indexing continuing. GGAT project archives 'largely uncatalogued'</td>
</tr>
<tr>
<td>3.5</td>
<td>Data security</td>
<td>Achieved</td>
<td>Fine for digital data. Digitisation of non-digital material 'ongoing'; no defined 'planned future provision'.</td>
<td>Achieved</td>
<td>Comprehensive system security policy. Digitisation and security copying of non-digital material 'will take place as and when funding allows and will form part of future forward plans for the HER'</td>
<td>Achieved</td>
<td>Digital data covered by system security policy and implementation of new HER system and contracts. Arrangements and planned future provision for non-digital material less clear. Mostly achieved for HER Not achieved for GGAT project archives</td>
<td>Digital data covered by system security policy. There is a backlog of non-digital material awaiting review for potential long-term digital archiving. Older projects have no security copy, future projects will be deposited with security copy.</td>
<td></td>
</tr>
<tr>
<td>3.6</td>
<td>Information audit on quinquennial basis</td>
<td>Achieved</td>
<td>Due for review 2010-11</td>
<td>Achieved</td>
<td>Due for review 2010-11</td>
<td>Achieved</td>
<td>Due for review 2010-11</td>
<td>Achieved</td>
<td>Due for review 2010-11</td>
</tr>
<tr>
<td>3.7</td>
<td>Data validation and currency</td>
<td>Achieved</td>
<td>In 3.6, with forward plan in 4.4a, updated to 12/1/09, but needs updating. Future programme could be more clearly stated as separate document.</td>
<td>Achieved</td>
<td>In 3.6 and 4.4</td>
<td>Achieved</td>
<td>In 3.6, and in audit timetable database, as amended and periodically updated. Re-assessment of backlog to be included with updated Audit in 2010-11</td>
<td>Achieved</td>
<td>Assessed as part of Data Audit in 2006. To be revised April 2010. Significant resource issues.</td>
</tr>
<tr>
<td>3.8</td>
<td>Safeguards against foreseeable risks and disaster</td>
<td>Achieved</td>
<td>Updated version received</td>
<td>Achieved</td>
<td>Updated version received</td>
<td>Achieved</td>
<td>GAT and HER documents provided</td>
<td>Achieved</td>
<td>Risk Assessment and Emergency Preparedness plan provided</td>
</tr>
<tr>
<td>Benchmark</td>
<td>Item</td>
<td>CPAT</td>
<td>CPAT details</td>
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<td>4</td>
<td>Organisation Management</td>
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<tr>
<td>4.1</td>
<td>Formal adoption as a maintained public information resource for understanding and enjoyment of the local historic environment</td>
<td>Achieved</td>
<td>Statement of formal adoption by relevant LPAs, sample agreement provided</td>
<td>Achieved</td>
<td>Statement of formal adoption by relevant LPAs, sample agreement provided</td>
<td>Achieved</td>
<td>Statement in benchmark review. eg not provided.</td>
<td>Achieved</td>
<td>Agreements in place with all twelve Unitary Authorities.</td>
</tr>
<tr>
<td>4.2</td>
<td>Formal agreement on geographical coverage and service levels with partners/service providers</td>
<td>Achieved</td>
<td>Statement of formal adoption by relevant LPAs, sample agreement provided</td>
<td>Achieved</td>
<td>Statement of formal adoption by relevant LPAs, sample agreement provided</td>
<td>Achieved</td>
<td>Statement in benchmark review. eg not provided.</td>
<td>Achieved</td>
<td>Agreements in place with all twelve Unitary Authorities.</td>
</tr>
<tr>
<td>4.3</td>
<td>Statement of purpose or mission statement, policies and key aims of the service</td>
<td>Achieved</td>
<td>Welsh Trusts’ Position Statement</td>
<td>Achieved</td>
<td>Welsh Trusts’ Position Statement</td>
<td>Achieved</td>
<td>Welsh Trusts’ Position Statement; mission statement in Forward Plan</td>
<td>Achieved</td>
<td>Welsh Trusts’ Position Statement</td>
</tr>
<tr>
<td>4.4</td>
<td>Forward Plan supported by appropriate budgetary provision</td>
<td>Achieved</td>
<td>Forward plan in place, due to be revised April 2010. Budgets limited, derived largely from RCAHMW, some other funding.</td>
<td>Achieved</td>
<td>Forward plan in place. Budgets limited.</td>
<td>Achieved</td>
<td>Forward plan in place, due to be revised April 2010. Budgets limited, derived largely from RCAHMW, some other funding.</td>
<td>Partly achieved</td>
<td>New forward plan to be drawn up in April 2010. Limited resources are a significant factor, so it has proved difficult to implement improvements.</td>
</tr>
<tr>
<td>Bench-mark</td>
<td>Item</td>
<td>CPAT</td>
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<tr>
<td>4.5</td>
<td>Professional archaeological / historic environment officer with primary responsibility for managing the Record</td>
<td>Achieved/ partly achieved</td>
<td>'A full-time Regional HER Officer is in post. However, this is not sufficient to meet the level of service required.'</td>
<td>Achieved/ partly achieved</td>
<td>'Although task-based work is funded by an annual grant from RCAHMW the funding is not sufficient to provide for a full-time HER Manager…. The highest priority for the HER is the need to secure the funding for, at the very least, a full-time HER Manager.'</td>
<td>Achieved/ partly achieved</td>
<td>'Formal HER funding from RCAHMW does not support a full time member of staff. However, two members of staff now work in the GAT HER, albeit undertaking additional functions and therefore supported by other funding streams (which unfortunately these cannot be guaranteed).’</td>
<td>Achieved/ partly achieved</td>
<td>'One full-time member of staff is employed, however, this is not commensurate with the level of services required as identified in the 2006 audit.'</td>
</tr>
<tr>
<td>4.6</td>
<td>Appropriate internal management arrangements, in relation to the organisation’s overall structure, including administrative and clerical support</td>
<td>Achieved</td>
<td>Summarised in Audit</td>
<td>Achieved</td>
<td>Summarised in Audit</td>
<td>Achieved</td>
<td>Staffing diagram provided</td>
<td>Achieved</td>
<td>Statement that this is in place.</td>
</tr>
<tr>
<td>4.7</td>
<td>Technical advice: system support for IT and access to other relevant professional advice on archive and records management</td>
<td>Achieved</td>
<td>IT support agreement for HER software to be signed shortly. RCAHMW provides archive support.</td>
<td>Achieved</td>
<td>IT support agreement for HER software to be signed shortly. DAT IT policy. RCAHMW provides archive support.</td>
<td>Achieved</td>
<td>IT support agreement for HER software to be signed shortly. GAT internal IT support. RCAHMW provides archive support.</td>
<td>Achieved</td>
<td>IT support agreement for HER software to be signed shortly. Network and hardware support services are in place. RCAHMW provides archive support.</td>
</tr>
<tr>
<td>4.8</td>
<td>Staff training and development programme and resources</td>
<td>Achieved</td>
<td>CPAT training plan provided. IfA RO status signifies commitment to CPD</td>
<td>Achieved</td>
<td>DAT training and development plan, MP training undertaken. IfA RO status signifies commitment to CPD</td>
<td>Achieved</td>
<td>Sufficient training provided for HER needs, although GAT does not operate a formal training plan. IfA RO status signifies commitment to CPD</td>
<td>Achieved</td>
<td>Training plan in place, and clear commitment by GGAT to CPD.</td>
</tr>
</tbody>
</table>
Appendix 3 Archaeological project archives and HERs

Definition of an archaeological archive

Archaeological archives have been defined as:
‘All material from archaeological excavations, evaluations, site assessments and formal fieldwalking projects...this includes all artefacts, human remains, environmental evidence eg bones, soil samples, paper records, eg plans, notes and record sheets, photographic materials, digital records and any post excavation records in any format eg specialist reports, conservation reports, archive reports and publications’ (Henderson and Parkes 2004)

HERs and archaeological archives

The first edition of Informing the Future of the Past (IFP) in 2000 made the following statement about SMR collections of primary materials:
‘SMRs are not normally equipped to hold original paper or digital archives or archaeological finds, and managers are recommended to identify appropriate repositories for original materials in their collecting policy – for example documents will normally be deposited at the local records office and finds at local museums. SMRs generally hold reference collections of secondary sources but often include primary materials such as site-visit forms, letters, reports and photographic materials.’ (Fernie and Gilman 2000, B12)

The section on museums included the following:
‘Museums hold collections of objects and associated archives relating to their sphere of interest and may act as a repository for finds from archaeological excavations in the region.’ (Fernie and Gilman 2000, A13)

By the time the second edition of IFP was published in 2007, the role of museums had become more closely defined in relation to archaeological archives:
‘Museums hold collections of objects and are the primary location for archaeological archives resulting from fieldwork relating to their sphere of interest. They play a vital role in curating such archives, containing as they do ‘...all parts of the archaeological record, including the finds and digital records as well as the written, drawn and photographic documentation’ (Perrin 2002).’ (Gilman and Newman 2007, A22)

GGAT archaeological archives from projects

GGAT made the following statement regarding project archives held by the GGAT HER Charitable Trust:
‘On the issue of the condition of the archives transferred to the HER, it should be noted that this is very much a legacy issue – ie the GGAT HER Charitable Trust would not (and should not) accept partially sorted poorly indexed archives. However, at point of creation (31 January 2008) the Trust passed on all relevant material to the GGAT HER Charitable Trust as covered by the definition at Clause 42(K) – our interpretation is that this included project archives and particularly those where there is no agreed depository in many cases projects of a minor nature or ones that had no significant collections of finds (note at Clause 7 (b) the Trustees of GGAT HER Charitable Trust have the power to promote objects including the safe-keeping of materials and objects recovered as a result of archaeological
work) the collection also includes copies of project archives or parts of project archives where the main archive has been deposited elsewhere (eg RCAHMW/NMGW). As previously stated additional and future material will not be accepted unless properly archived and security copies have been made.

'It would be our position that we were effectively required to do this, but clearly it to a degree gave the collections improved security. In the lead up to the transfer the issue of costs of identifying ordering archives to be in the HER was considered but no support was available. The legacy issue will only be dealt with through a funding investment. Currently, the sole Trustee is GGAT and therefore a) wherewith the separation arguments to protect the assets if the separating body has to pay for the maintenance of the asset; b) will depend on the ability of the Trustee to raise funds from other sources or put its own resources into this.' (email dated 23 March 2010)