



Scottish Museums Council Response to the Draft Culture (Scotland) Bill Consultation

The Scottish Museums Council (SMC)

1. SMC is the main channel for the Scottish Executive (SE) support to, and the member organisation for, non-national museums and galleries in Scotland.
2. SMC provides strategic leadership for the sector, supporting its development to unlock the potential of museums and galleries in Scotland.
3. Currently SMC has 206 members, which manage 341 museums all over Scotland, including 161 independent, 142 local authority, 31 University and 7 regimental museums. The SMC museums sector membership covers all 32 local authorities with local museums and galleries that range in size from small voluntary trusts to large metropolitan services.
4. As well as providing advice to the SE on the museums sector, SMC is a membership organisation, governed by an independent board of Directors who are also trustees of the organisation in its role as a charity.
5. SMC welcomes the opportunity to comment on the Draft Culture (Scotland) Bill. The development of such a Bill is a marker for the importance which the SE places on culture within a devolved Scotland. The First Minister's St Andrew's Day speech marked a significant step in the recognition of the important role of culture and was followed by the important policy document *Scotland's Culture* which recognised the importance of the collections held in Scotland's museums and galleries. There is no agreed working definition of culture, although *Scotland's Culture* provided a broad definition. Museums have a key role to undertake within the delivery of cultural services across Scotland and to contribute in a meaningful way to how local authorities improve their performance across the board. This includes key areas such as health and well-being, quality of life, tourism, education, regeneration and citizenship.

6. SMC held a consultation event on the Draft Bill to inform this response (see Annex). It was clear that members have firm ideas about the role of SMC in relation to the areas of activity outlined in the Bill.

Definition of Culture

7. SMC members raised the point that there is no definition of “culture” in the Draft Culture (Scotland) Bill. The term culture in the Draft Bill should reflect the diversity of the whole cultural sector, including museums, arts and libraries. However, the focus seems to be on arts as opposed to culture more generally. An example is the establishment of Creative Scotland. This body is defined as a cultural development organisation whereas the remit seems to be more arts development focused. The use of terminology here is potentially confusing for all. Where reference is made to arts organisations and remit, the word “arts” should be used and, where culture is meant in its entirety, then “culture” should be used. Many local authorities have argued that sport and leisure should be included within a definition of culture. This adds an extra dimension to the process of defining culture, which is not addressed by the Draft Bill.

8. SMC members felt that the Draft Bill and Guidance do not acknowledge the contribution of the museums sector and that they lean strongly towards the arts sector not the whole of the cultural sector.

Role of SMC

9. Although SMC is not directly subject to the proposed legislation, the organisation provides a major leadership role across the sector which is recognised in the draft Guidance and in *Scotland's Culture*.

10. As part of SMC's consultation on the Draft Bill and Guidance, SMC members identified the role of SMC as key to the ongoing development of the museums sector. Members indicated very strongly that they wish SMC to remain as a membership organisation. They see SMC's role as

- strategic
- creating opportunities for museum and partnership development for members
- advising the SE and the sector
- managing standards (including Accreditation)
- advocacy for the museums sector
- developing strategic partnerships – within and outwith the sector, and outside Scotland
- collecting information for policy making.

11. Concern was raised about the lack of clarity of roles in the Draft Bill, particularly in reference to the leadership role of SMC and the proposed

leadership roles of National Museums Scotland (NMS) and the National Galleries of Scotland (NGS) (referred to as “National Collections”¹).

12. Members welcomed the emphasis on partnership working but were concerned that there is no statutory requirement for the National Collections to work in partnership with other cultural organisations. It was felt that there was not adequate recognition of what non-national museums could bring to partnerships and that there is no parity of esteem across the museums sector.

13. SMC members felt that SMC provides a very strong strategic leadership role for the whole of the museums sector which should be continued. The Draft Bill and Guidance could build on this established network.

¹ The term National Collections is used throughout the consultation document introduction and questions to refer to the National Cultural Bodies. The term National Cultural Bodies as used in the text of the actual Bill would appear to be more accurate. The term National Collections only refers to one element of the work of the National Cultural Bodies. For ease of reference, we have used the term National Collections in our response to reflect the terminology used in the consultation introduction and questions.

Consultation Response

Local Cultural Entitlements

Q1. Do you think that developing local cultural entitlements will help to increase participation in cultural activities?

14. The introduction of local cultural entitlements is a very positive step toward increasing participation in cultural activities. In order for this model to be successful, the development process should ensure inclusion of entitlements in all cultural areas. If the Guidance does not ensure inclusion of all cultural areas, there is a danger that local authorities might look to meet the requirement using only a limited number of cultural areas. The Guidance should require the development of meaningful entitlements across the different service areas of museums, arts and libraries.

15. By introducing stated and accountable entitlements, this will highlight further areas of cultural provision to the public. The process of developing entitlements should be carried out through meaningful community engagement. There are good examples of community engagement between museums and their communities which should be built on. One example is Renfrewshire Museums' *Our Community*, which celebrated local cultural diversity and developed new audiences.

16. SMC membership includes local authority, university and independent museums. While the Draft Bill explicitly deals with local authorities, the role that independent and university museums can play in contributing to the development and delivery of cultural entitlements is not made clear. Partnership working is developing very strongly through recent Regional Development Challenge Fund (RDCF) projects, (see www.scottishmuseums.org.uk) which include museums across the sector. These types of partnerships include non-local authority museums and provide a mechanism for these museums to contribute to the delivery of cultural entitlements. This cross-sectoral approach is very much in the spirit of community planning partnerships. The role of community planning in engaging the independent and university museums in the development and delivery of entitlements should not be underestimated.

17. To ensure the maximum impact of the new entitlements, it will be necessary to have rigorous monitoring. Concern has been raised about the fact that information is only to be provided "on request by Ministers".

18. At present, there is great regional variation across local authority areas between the provision of museums and other cultural services. This is a combination of historic circumstances and also ongoing local development and investment. The Bill does not seem to redress this balance by enabling a more uniform level of quality provision across local authority boundaries. Rural areas

with scant cultural resources provision may find it challenging to develop cultural entitlements.

19. The introduction of entitlements appears to limit what might be developed, i.e. there will be no incentive to provide additional services over the stated Ministerial requirements. There is no enforcement for entitlements. This potentially impacts on quality and access.

Q2. If you believe further or alternative measures are necessary, what are they?

20. SMC welcomes the concept of the model of Cultural Pathfinders as a positive step to develop entitlements.

21. The current Pathfinders projects are primarily arts lead and have little museum involvement. This part of the Guidance does not seem to maximise the potential of cultural service delivery for users. It should be ensured that all areas of cultural services are included and outlined in the Guidance to deliver entitlements. SMC members felt that local authorities should be required to include explicit museum entitlements.

22. There should be further guidance to ensure meaningful community engagement, including all potential users. This could assist in developing more relevant and meaningful entitlements, maximising the possible benefit to users (See discussion in Question 1).

23. Defining and providing entitlements is an evolving process, and it is necessary to ensure robust national standards for entitlements. Potential for wide regional variation could weaken the true value of having cultural entitlements and result in a “post code lottery”.

24. Although the introduction of entitlements is welcomed, some concern was raised as part of SMC’s consultation that entitlements are not as strong as rights. Members felt that, without additional resources, it would be difficult to engage with new audiences. The SE has indicated that more resources will not be provided to meet new requirements.

25. The Bill introduction also highlights that there is no right to entitlements. This weakens the power of the entitlements and the accountability of the local authorities to provide the entitlements.

Q3. How do you think the Scottish Executive and local authorities can best utilise the influence and impact of cultural activity?

26. The Guidance outlines the introduction of Quality Assurance Frameworks (QAF) across the cultural sectors. SMC, the Scottish Library Information Council (SLIC) and the Scottish Arts Council (SAC) are already developing sector specific frameworks. From a local authority perspective, this will position cultural services in a more accountable framework, in line with other services. The QAF will act as a mechanism for cultural planning. SMC members welcomed the inclusion of existing accreditation standards within the proposed museum QAF.

27. SMC welcomes the development of a joined up QAF for all cultural sector services. This would include the individual cultural services frameworks being aligned in one collective coherent framework. There should be clear guidance to ensure data collection is rigorous and the content being returned is consistent. The data collection process should be transparent and the results easily accessible.

28. Members thought that a QAF should include an external assessment element to ensure that the system would be robust and meaningful.

29. SMC will be undertaking research as part of the QAF development, with measurable outcomes which will dovetail with the requirement for outcomes detailed in the Bill.

30. Some local authorities are already embedding culture and heritage as key themes within community planning partnerships. This is a practice which could be strongly encouraged as a way of ensuring that culture is recognised for its contribution to meeting local authority objectives. The involvement of cultural planning within the community planning process is crucial to culture being seen as integral to local authority service delivery. As part of this process, it is essential that cultural service delivery is embedded within specific statutory plans, such as Community Learning and Development Plans. Local authority boundaries should not restrict access to cultural facilities across neighbouring local authority areas. Strategic Change Fund (SCF) and RDCF projects have exemplified excellent cross-boundary museum projects. The following are two examples of such projects

- *Scottish Museums Leadership Development Project* (SCF)
This initiative brought together 26 museum staff from 12 local authorities and the University of Glasgow, each undertaking a leadership development programme in association with the Scottish Leadership Foundation.
- *West of Scotland Local History and Archaeology Strategy* (RDCF)
This project had eight local authorities working together to create a

consistent Local History and Archaeology Strategy for the West of Scotland. This is the first project in the UK to address local history in terms of a combined approach to archaeology, the built environment, archives, museum collections, library collections and evidence for landscape history, formalising and quantifying existing knowledge and resources.

31. The Bill should articulate that appropriate links should be made between the cultural sector and community planning partners, such as the enterprise agencies and Communities Scotland. There is also a need for the cultural sector to have an understanding of, and involvement in, the community planning process, as it is key to the development of cultural entitlements.

32. The role of volunteers in providing a major workforce for the cultural sector is not acknowledged within the Draft Bill and Guidance. Local authorities rely on the volunteer workforce to contribute to their service delivery and, through this, assist in delivering entitlements. Support of volunteers can contribute to the capacity of local authorities to meet both the entitlement and community planning aspects of the proposed legislation.

33. Voluntary sector providers and organisations, for example the Scottish Council for Voluntary Organisations (SCVO), have a role in providing support and resources for organisations which use volunteers for the delivery of cultural services. There may be a capacity issue relating to their participation in the development of cultural entitlements. It is important that the role of the voluntary sector is recognised by the cultural sector and local and central government.

Q4. Do you think the initial draft Guidance under this part of the Culture Bill is clear and helpful? Is there anything else it should contain?

34. The production of guidance which explains how the Draft Bill will work is welcomed. The emphasis on the delivery role of local authorities is of particular relevance because the SMC membership currently includes all 32 local authorities. The Draft Bill builds on existing legislation which currently gives local authorities a statutory duty to provide adequate cultural services, (Public Libraries and Consolidation (Scotland) Act 1887 and the Local Government Act 1982). There is no definition of “adequate”, which can result in unequal levels of service delivery by local authorities. There is a lack of clarity about the definition of entitlements and exactly what is required. SMC is also concerned about the fact that there is no guarantee of communities accessing their cultural entitlement even if the structure has been established.

35. The recognition of existing partnerships and the role that non-local authority museums could contribute to the community planning process is positive. Independent and university museums are working in partnership and individually for the provision of important museum services in their own areas. This could

assist local authorities in providing museum services for communities in local authority areas, as well as providing cultural services, which are valuable in their own right. Free child access to all museums in each local authority area, including museums which currently charge, is an example of a possible entitlement which could make museums accessible to a wider audience. The Draft Bill and Guidance also refer to a lead officer and cultural champion which is welcomed. Although there have been long standing ad-hoc partnerships, the process of entitlements will put partnership working on a more formal footing.

36. The following are examples of activities that could be framed as entitlements

- *Museums and Galleries for Every School* research at SMC. The entitlement would be for every school child to be able to access museum services.
- *Class Connections*
The entitlement is free bus visits to cultural and leisure facilities for school children in Glasgow. More information is available at
- <http://www.glasgow.gov.uk/NR/rdonlyres/2416064D-A266-496F-8E45-27A62F687B28/0/CLSAAnnualReview20042005textversion.pdf>
- *Scotland and Medicine* RDCF partnership project
The entitlement is access to important medical collections held in both non-national and national museums, by a variety of media. More information is available at <http://www.scotlandandmedicine.com/>

37. It was suggested that museum entitlements need to be framed around access to collections. In terms of developing entitlements, it needs to be remembered that museums are used in many ways. There is a need to make collections relevant to communities. By gaining significance recognition, many collections in Scotland outwith the National Collections will be seen as valuable by the public. SMC is leading on the Significance Recognition Scheme (See www.scottishmuseums.org.uk). An entitlement could be access to those collections recognised as nationally significant and held in local museums. It is important to recognise that collections have broader value and benefit to communities beyond the confines of local authority boundaries.

Creative Scotland

Q5. Do you agree there should be a single national cultural development body?

38. The use of the term “single national cultural development body” is unclear (see *Definition of Culture* in the introduction to this response). As Creative Scotland will replace Scottish Screen (with the exception of the Scottish Film

Archive) and SAC, the draft remit seems appropriate. Members felt that Creative Scotland is drafted as an arts development body rather than a cultural development body. The terminology used here is potentially confusing. It is suggested that where reference is made to arts organisations, the word “arts” should be used and, where culture is meant in its entirety, then “culture” should be used.

39. The key organisations identified as lead bodies in their respective sectors, such as SMC and SLIC, will work in partnership with Creative Scotland. This should be listed in the Guidance regardless of the fact that the legislation does not relate directly to the bodies.

40. It is worth noting that there is already strong partnership working in the sector. In order to develop and maximise the output of the cultural sector, the key links between Creative Scotland and other organisations should be acknowledged.

Q6. Do you agree with the remit proposed for Creative Scotland? Has it the right powers and functions?

41. Concern has been raised about the perceived increased level of potential ministerial intervention over various parts of the cultural sector, including the new Creative Scotland body (see Question 5).

Q7. Do you agree that Creative Scotland should work in concert with the Scottish Executive to implement national cultural policy?

42. It is appropriate that Creative Scotland should work in concert with the SE to implement elements of national cultural policy, but this function should not be in isolation. As previously stated, Creative Scotland should have a remit over arts policy but not cultural policy more generally. The role of other key bodies such as SMC in providing advice and information to the SE on their sector should be acknowledged. The Joint Implementation Group used to implement the National Cultural Strategy already creates a mechanism for doing this.

43. There is an element of overlap between the visual arts development role, which includes an element of collections development, and the strong collections development role of SMC, which includes art collections.

National Collections

Q8. Do you agree that the National Collections should remain as constitutionally separate centres of excellence?

44. The reference to “National Collections” is confusing and misleading. The collections of the National Cultural Bodies are not regarded as a whole either by their parent bodies or by the rest of the cultural sector. Although the introduction to the Bill requires closer working together of the institutions, it does not set up a body called the “National Collections Board”. Clearer definitions are required for the terms “National Collections”, “National Collections Board” and “National Cultural Bodies”.

45. While NMS and NGS are clearly centres of collections excellence, it should be noted that there are collections of recognised significance held in non-national museums and galleries. The *National Audit of Scotland’s Museums and Galleries* identified the collections of national and international significance held in museums throughout Scotland in the whole of the museums sector. SMC is leading on the Significance Recognition Scheme (see www.scottishmuseums.org.uk). The Draft Bill and Guidance do not acknowledge the distributed nationally significant collections.

46. The partnership opportunities between the National Collections and non-national sector should be strongly acknowledged. SMC welcomes the development of partnership working which is being undertaken by NMS and NGS, and will look to engage with ongoing meaningful and equal partnership development across the sector.

47. SMC members feel that it is important that the existing relationship SMC has with the SE as an advisory body should continue.

Q9. Do you think the powers and functions proposed for the Collections in the Draft Bill and Guidance are right? If not how would you improve them?

48. While there is a leadership role for the National Collections, there is also a strong leadership role in the sector for SMC. The National Collections are identified as providing a leadership role to local collections. This role is already undertaken by SMC. SMC has exercised strong leadership through the development of the Collections Development Strategy for the whole of the sector. SMC worked with members to identify key priorities, including

- engaging people
- improving knowledge
- shaping collections.

(See www.scottishmuseums.org.uk)

49. More clarity is required in the definition of the roles of the National Collections in terms of advice and offering support to local museums and galleries.

50. SMC members identified the following roles of the National Collections as being particularly important in relation to partnership with the non-national museums

- curatorial advice
- conservation advice
- discipline-based research
- exhibitions
- loans
- subject specialist networks
- partnerships with other museums including above areas.

Q10. What do you think of the name ‘National Record of Scotland’?

51. The words “record” and “archives” (used in National Archives) could be confused and make it more difficult to be clear about the different functions of these two institutions. The name should clearly reflect the function of the organisation.

Q11. Do you agree that the Faculty of Advocates should be able to contribute to the board of the National Library by having at least one representative?

52. This question does not relate directly to the museums sector.

Q12. Do you agree that the Collections have the appropriate powers to obtain, loan and dispose of objects for or from their collections? If not, what would you change?

53. The powers to obtain, loan and dispose of objects for and from the collections held by the National Collections are generally appropriate. It should be ensured that these powers are operated within current museum standards. This could refer to Museums Accreditation or Museum Quality Assurance Framework when introduced.

54. It is important also that National Collections are made as accessible as possible to a diverse audience, through developing loan and partnership opportunities across Scotland.

55. It should be stated in the Draft Bill and Guidance that the National Collections should work in partnership with non-national museums to display items from other collections in Scotland. The recent “Consider the Lilies” project, where Dundee’s McManus Galleries loaned part of their art collections to NGS for a showcase exhibition in the Dean Gallery, is an excellent example of this type of two way partnership.

Dealing in Tainted Cultural Objects

Q13. Do you agree that an offence similar to that in the 2003 Act should be introduced in Scotland?

56. SMC agrees that there should be an offence similar to that set out in the Dealing in Cultural Objects (Offences) Act 2003. In many countries, legislation is less robust than here in Britain, resulting in a widespread trade in illicit objects worldwide, some of which find their way here. UK museums and galleries hold collections of international renown and world-class importance. It is appropriate that the UK leads by example in ensuring that cultural property is protected. The lack of legislative protection around the trading of ‘tainted’ objects leaves Scotland at risk of becoming the main route by which such items enter the UK.

57. The proposed new legislation supports ethical guidance to museum and gallery professionals who are already extremely vigilant in such matters when acquiring for collections. It will further protect practitioners from risk of innocently acquiring tainted material, and enable reporting if a suspicious item is presented. Moreover, it will act as a deterrent and so reduce levels of such activity, so may contribute to better public trust in museums as safe repositories for cultural assets.

58. There is much sense in adopting the same definitions north and south of the border. If the proposed new legislation is enacted, it would be useful to produce similar guidance to that produced by the Department of Culture Media and Sport to support the introduction of the Dealing in Cultural Objects (Offences) Act 2003.

59. However, the proposed new legislation will not address a concern around material excavated in Scotland by chance finders who may, sometimes inadvertently, not report material for claiming as Treasure Trove. Since reporting is currently non-statutory, important Scottish archaeological objects can slip through the net if retained by the finder, thus falling outside the definition of ‘dealing’. There is therefore an opportunity to tighten up an existing loophole in the current protective legislation that might be included in this Bill.

Powers of Local Authorities to Broadcast Information

Q14. Do you agree local authorities should have a general power to broadcast information about their activities?

60. The introduction of a general power to broadcast is a very positive step for local authorities and the cultural sector. This would enable the development of broadcasting at a local level as a means for disseminating information and celebrating good practice. In a multidisciplinary environment, the potential for cross-cutting cultural development could be progressed innovatively by this power.

Q15. Do you think it is necessary to give authorities this power in this Bill, or should local authorities be left to rely on “The power to advance well-being” in section 20 of the Local Government in Scotland Act 2003?

61. The specific power offered by this Bill is to be welcomed as an appropriate contribution to the modernising agenda and also as a valuable integral part of the proposed Culture Bill.

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Annex

SMC Draft Culture Bill Consultation Event

On 1 March 2007, SMC hosted a consultation event for members to discuss the Draft Bill and Guidance. National Museums Scotland, National Galleries of Scotland, Convention of Scottish Local Authorities (COSLA) and the Scottish Executive were invited as contributing observers. Local authority, university and independent museums were represented at the consultation. Comments from the consultation are included in the above response.

Programme of the day

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| 10:30 – 10:50 | Coffee and Registration |
| 10:50 – 11:00 | Welcome – Joanne Orr, Scottish Museums Council |
| 11:00 – 11:20 | The Draft Culture (Scotland) Bill – Greig Chalmers, Scottish Executive |
| 11:20 – 11:40 | Cultural Planning and Entitlements – Sue Selwyn, Scottish Executive |
| 11:40 – 12:40 | Workshop One |
| 12:40 – 13:00 | Feedback from Workshop One |
| 13:00 – 13:45 | Lunch |
| 13:45 – 14:45 | Workshop Two |
| 14:45 – 15:05 | Coffee and feedback from Workshop Two |
| 15:05 – 15:30 | Summary of day from groups and next steps |
| 15:30 | Close |

Workshop questions

Rather than consultation event workshops considering the 15 consultation document questions, we think it would be useful to focus in on the four key areas identified by SMC for further discussion. These areas directly impact on museums and SMC members and directly link to the key consultation questions. Further consideration of these points will add to the detail of SMC's response.

All discussion groups will look at the same questions. There will also be an opportunity to comment more widely on the Draft Bill and Guidance during the consultation day.

Workshop 1

SMC's development role for the non-national sector

SMC is a membership organisation and not a Non Departmental Public Body and therefore is not directly considered in the legislation. However the role of SMC is identified in *Scotland's Culture* and in the Draft Bill Guidance, which indicates that SMC provides "strategic leadership for the non-national museums and galleries sector, underpinned by targeted investment of advice and funding and the promotion of best practice."

The Draft Bill requires the National Museums and Galleries to provide support to other museums and galleries in Scotland.

1. What role do you think SMC should have in the museum's sector?
2. Do you think the SMC role should be explored or included in the draft Guidance?
3. Please provide practical suggestions to take this forward.

Collections

The introduction to the Bill details that:

Together [The National Collections] are responsible for collecting, preserving and exhibiting cultural objects of national importance ... for public access (4.2). We want the National Collections to continue to do what they do now (4.3). We want them to ensure there are no barriers to joint working between bodies ... We also want the Collections to continue and enhance their leadership and support of local collections (4.4)

1. What role do you think the National Collections should have in the museums sector?

2. Do you think the National Collections' role should be explored further in the draft Guidance?
3. Please provide practical suggestions to take this forward.
4. How should the respective roles of the National Collections and SMC relate to areas of support offered to Museums?

Relevant questions from the consultation paper – 8, 9, and 12

Workshop 2

Development of Cultural Entitlements

The Draft Bill details the requirement for Local Authorities to provide and detail cultural entitlements. It refers to the new Cultural Pathfinders projects as models for developing cultural entitlements. Cultural entitlements are a ministerial requirement and should be developed as part of the cultural planning process.

1. Do you think that developing local cultural entitlements will help to increase participation in museum activities?
2. Do you think the draft Guidance relating to local cultural entitlements is clear and helpful?
3. Would you like to see more museum examples of cultural entitlement and if so can you suggest any?

Relevant questions from the consultation paper – 1-4

Development of the Museums Sector Quality Assurance Framework

The Draft Bill outlines a new Quality Assurance Framework (QAF) to which all cultural services – museums, libraries and arts organisations will be required to adhere. The Bill will require Local Authorities to assess the quality of their performance in providing cultural services. The three individual museums, libraries and arts QAFs will feed into an overarching QAF which will be used to inform Scottish Ministers about each Local Authority cultural services and provision.

SMC is leading on the development of the museums sector QAF, which has already been subject to member consultation. The QAF will be piloted at a later stage.

1. How valuable is the QAF, within a local authority and central government culture of continuous improvement for the delivery of museum services?

2. What might need to be taken into account when considering how the three cultural services QAF could feed into an overarching QAF?

Relevant questions from the consultation paper – 3, 4

Organisations represented at the event

Aberdeen City Council
Angus Council
Auchindrain Museum
Dundee City Council
East Dunbartonshire Council
East Renfrewshire Council
Edinburgh City Council
Falkirk Council
Glasgow City Council
Hunterian Museum and Art Gallery
Inverclyde Council
Kilmartin House
Moray Council
Morita Museum of Fine Art
National Museums of Scotland
North Lanarkshire Council
Paxton Trust
Royal College of Surgeons of Edinburgh
Scottish Borders Council
Scottish Executive
Scottish Mining Museum
Stirling Smith Museum and Art Gallery
West Dunbartonshire Council

Marischal Museum submitted comments in writing.