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Clare Adamson MSP
Convener
Constitution, Europe, External Affairs and Culture Committee
c/o Clerk to the Committee

Dear Ms Adamson

Further information following the Constitution, Europe, External Affairs and Culture Committee sessions on Historic Environment Scotland

Thank you for inviting Sir Mark Jones and Andrew Davis to give evidence to the Constitution, Europe, External Affairs and Culture Committee on 30 October 2025.

During the session, there were several requests for specific information, as well as some areas where we wish to provide further clarification to assist Members in their scrutiny. We also noted a few topics which came up at the session of 6 November which we feel we can provide further information on. Please find these below.

I hope this is helpful to the committee. Please do not hesitate to let me know if we can provide any further information that would be of assistance.

Yours sincerely,

Alison Turnbull

Director of External Relations and Partnerships



Notification to the Scottish Government regarding the Accountable Officer

Minutes show that the Board discussed the absence of the Chief Executive and the implications that this would have for the role of Accountable Officer on 28 May 2025. Whilst it is conventional for these two roles to be held by the same person, the two are distinct, with the Accountable Officer being designated by the Permanent Secretary of the Scottish Government.¹

The absence of the CEO (and the related impact on the AO role) was discussed repeatedly at Board meetings, with Scottish Government officials in attendance. Scottish Government confirmed to the Board that the AO had informed the Permanent Secretary of her absence on 3 July 2025.

In the interim period, the Executive Leadership Team has operated under a delegated authority framework agreed with the Board and the Scottish Government's sponsorship team. Scottish Government was kept fully informed of these arrangements at all stages.

As Sir Mark Jones communicated in the committee session, the Board and Scottish Government have agreed to appoint a temporary Chief Operating Officer for six months, to work with the Executive Leadership Team, the Chair and the Board and to continue to build upon existing work going on across the organisation. Our key focus remains the wellbeing of our staff and championing Scotland's historic environment during this time.

Clarity around of budgeting process for Pay Policy

The Scottish Government's Public Sector Pay Policy and the Public Sector Pay Policy Technical note no. 01/24 was published on 30 May 2024, outlining that the overall pay award may be in excess of 2.25%. The Financial Strategy went to HES Board on 6 June with the figure of 2% as it had been drafted and submitted prior to the Public Sector Pay Policy being issued. The purpose of the financial strategy was to give high level projections to allow the Board to get a view of the future finances and to consider whether any strategic actions need to be taken in relation to those figures.

No budgetary decisions are made until after the SG budget announcement, and when the budget was submitted to the HES Board for approval in February of this year, it included a 3% figure to factor in the Public Sector Pay note.

¹ The roles of Accountable Office (AO) and Chief Executive Officer (CEO) are separate. The role of AO is designated by and responsible to the Permanent Secretary of the Scottish Government (in their role as Principal Accountable Office). The role of CEO is responsible to the Board.



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Partnership with the University of Glasgow

HES has a long-standing and valued research partnership with the University of Glasgow. This includes work on the 'Empire Project', which is a generic term to describe work that we're doing across the organisation, to research and understand the influence of Scotland's colonial legacy on the historic environment. As part of this project, we were collaborating with the University of Glasgow on a number of outputs resulting from a commissioned Empire Report [New Report on Connections Between Properties in Care and the British Empire released | HistEnvScot](#). We have built on the Empire Report in a number of ways, for example; by programming changes to interpretation at key sites identified in the report; partnering with Scottish Government on delivering their anti-racist curriculum through our learning programme; commissioning a number of co-designed workshops and exhibitions with community groups, artists and curators - one of which ('Traces of Empire') - is currently on show at Blackness Castle; working with marginalised groups to make new connections with heritage in Scotland and continuing to partner with the University of Glasgow on projects that follow up on the findings of the Empire Report.

In September 2025, the research team leading the work informed HES that it would pause collaborative work on this last piece of work, following allegations of racism involving a senior member of staff. We value our relationship with the University of Glasgow very highly and regret any disruption to our collaborative work. The University of Glasgow has not, as a whole, ruled out future internships and collaborations with HES, and other projects with the University of Glasgow will continue. The pause in collaboration with HES is neither a College nor a University of Glasgow position, and there will be no change to the current round of planned Scottish Graduate School for Arts and Humanities internships with HES in the areas of traditional skills provision, professional development in construction and a history of Scottish tourism. The academic grouping involved in the Empire Report will not however offer postgraduate interns to HES. This will remain the case as noted by the group, 'until the situation is resolved in a way that is transparent and in line with anti-racist principles and practices'.

We fully respect the University's decision regarding the Empire Project and have maintained open and constructive dialogue with them throughout. We are reflecting on recent events, and we remain committed to fostering a respectful, inclusive culture and to rebuilding confidence with all our academic and community partners. We recognise the need for meaningful action and we have committed to becoming an actively anti racist organisation, addressing all forms of discrimination. A review of our policies and procedures has been instigated and as part of this review we want to look at the term zero tolerance and how it's being used. We are developing an anti-racism manifesto,

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and we also are partnering with Diversity Scotland on an Equality Audit and anti-racism training.

Publication of a formal response on the HES Website

The Committee noted that no formal statement has yet been published on the HES website in relation to recent governance and cultural issues. This reflects ongoing internal and, in some cases, legally sensitive HR processes. We are keen to avoid prejudicing those processes or breaching confidentiality obligations.

Our website is used by a wide range of audiences, including UK and international visitors, researchers, and planners, who are seeking practical information, for example about visiting sites, buying tickets, accessing designation guidance and exploring Scotland's heritage. Publishing detailed commentary on internal matters in that space would not be appropriate for the majority of users and could risk confusion or reputational harm unrelated to the core purpose of the website. However, we remain committed to transparency and accountability. All media enquiries have been responded to with on-the-record statements and our responses have been published in the subsequent articles, ensuring that readers have access to our position and can see it in context. We have also responded directly to the small number of questions and complaints received from our HES Members and the general public. We continue to provide regular updates to staff, partners, and the Scottish Government where appropriate.

Concerns raised regarding the Knocknagael Boar Stone

HES is aware of concerns raised regarding the Knocknagael Boar Stone, a Pictish carved stone currently located in the Highland Council headquarters in Inverness.

The stone was designated as a Scheduled Monument until 2010, when it was de-scheduled. That decision was in line with HES's normal practice. When a scheduled monument is moved into a secure, curated, or indoor environment, it is customary to de-schedule it. This is because any associated archaeological context no longer exists once the object is removed from its original site.

While the stone is no longer a scheduled monument, it remains under our care. We have previously brought this matter to the attention of the relevant representatives at Highland Council and have requested action and the implementation of appropriate measures to ensure the stone continues to be preserved appropriately.

Protecting Scotland's heritage is a collective responsibility, and we welcome the commitment of committee members and others in bringing these matters to our



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attention. Our shared objective is to ensure that this important symbol of Pictish heritage continues to be cared for and accessible to the people of the Highlands.

HES Advice around Bannockburn Development

The *Inventory of Historic Battlefields* was introduced in 2011, which introduced special consideration within the Scottish Planning System to Historic Battlefield sites, including a duty for planning authorities to consult Historic Environment Scotland on applications that may affect an Inventory site. The advice we issue to planning authorities is a material consideration which they must take into account when coming to a decision about an application that affects an Inventory Battlefield.

The application referenced by Keith Brown MSP (Stirling Council Reference 23/00465/FUL) refers to land which was already allocated for development within a Local Development Plans (LDP) prior to the introduction of the Inventory. While the designation of an Historic Battlefield reflects the extent of the battlefield, and does not exclude land which is developed or already allocated for development in a LDP, where the principle of development has been previously agreed, we will provide advice to planning authorities on the need for mitigation as development proposals come forward. Where new allocations are proposed during development plan revisions, we provide advice on likely compliance with the National Planning Framework 4, in line with our Managing Change guidance note [Managing Change in the Historic Environment: Historic Battlefields](#).

Consultation on the 2014 LDP for the area began before designation of the Battlefield, and our records show that we recommended evaluation and mitigation of potential impacts on the battlefield as a key site requirement in our response to the consultation. This recommendation was implemented and carried forward in the current (2018) LDP.

There have been three successive planning applications within the allocation. The first was submitted in 2008 and later withdrawn. The second was submitted in 2021. HES responded noting that the principle of development had been established within the LDP, but that there remained potential for the development to have an adverse impact on the battlefield and further work was required to assess and mitigate these impacts. [Scottish Ministers](#) subsequently confirmed they were content with the application on heritage grounds, but refused the application on other grounds.

The current application was submitted in 2023. HES responded in September 2023 reiterating our previous comments. The application was subsequently approved by Stirling Council in October 2024, applying a condition which requires the developer to implement a programme of archaeological works in accordance with a written scheme of investigation approved by Stirling Council. The satisfying of this condition, including



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the agreement of the programme of archaeological works, is a matter for Stirling Council.

Continuing delivery and impact

HES continues to make strong progress in delivering our strategy, *Heritage for All*, and supporting the delivery of the national strategy for the historic environment sector, *Our Past, Our Future*. We are:

- Welcoming millions of visitors to our properties, and generating significant social and economic value for communities across Scotland through heritage tourism, wellbeing, learning, and national identity.
- Advancing the transition to net zero, reducing emissions across our estate and supporting sustainable adaptation in historic buildings.
- Supporting communities and local authorities through advice and support to help groups to conserve and make use of their heritage assets, as well as delivering grants which support conservation, skills, and community-led heritage projects across Scotland.

On skills specifically, the committee will be aware that Scotland faces a chronic shortage of traditional building and conservation skills, including masonry, joinery, lime work, and heritage project management. This shortage affects both HES's own estate work and the wider construction sector's ability to maintain traditional buildings (which comprise around 20% of Scotland's housing stock). HES is Scotland's largest provider of traditional skills training, delivering apprenticeships, craft fellowships, and technical education. Our Skills Investment Plan and Heritage Skills at Risk Register identify gaps and guide action, and we're developing Lock 16 in Falkirk in partnership with Scottish Canals, as a Centre of Excellence for canals and traditional skills, creating pathways into employment and tackling youth unemployment.

Closing

I hope this additional information is helpful in clarifying the specific matters referenced in the Committee's briefing and in illustrating the ongoing work of HES to deliver public benefit.

I would be happy to provide further detail to the Committee if required.