



EUROPEAN COMMISSION

Directorate-General for Communications Networks, Content and Technology

Media and Data
Creativity

**IMPLEMENTATION OF
THE COMMISSION RECOMMENDATION
ON DIGITISATION AND ONLINE ACCESSIBILITY
OF CULTURAL MATERIAL AND DIGITAL PRESERVATION**

PROGRESS REPORT 2013-2015

**Please complete and return by e-mail to
Rachel.Soucher@ec.europa.eu no later than 30 October 2015**

Country	Malta
----------------	--------------

Contact Details (info will not be published):

Name	Russell Muscat
Organisation	Ministry for Justice, Culture and Local Government
Telephone	+356 79728350
Email	russell.muscat@gov.mt

NOTE: This template follows the structure of the Recommendation of 27 October 2011 on the digitisation and online accessibility of cultural material and digital preservation. This template should be strictly followed.

The Commission Recommendation was endorsed by Council on its Conclusion of 12 May 2012. The priority actions and indicative timetable contained in these Conclusions should clearly be taken into account in your reporting of progress.

Please note that your report should focus on new developments in the reference period 2013-2015.

Please use the empty boxes underneath the questions to indicate your response/comments.

Besides your factual report, you are encouraged to raise any implementation problems or highlight any best practice examples to which you think special attention should be paid at national and/or European level. Where implementation is not fully reached, please describe how you plan to continue your work.

Please provide quantitative indicators on progress achieved, where applicable.

If no information is available for a question, please leave the corresponding box empty.

All reports will be published on the Commission's Digital Agenda for Europe website.

DIGITISATION: ORGANISATION AND FUNDING

1. PROGRESS ON PLANNING AND MONITORING THE DIGITISATION OF BOOKS, JOURNALS, NEWSPAPERS, PHOTOGRAPHS, MUSEUM OBJECTS, ARCHIVAL DOCUMENTS, SOUND AND AUDIO-VISUAL MATERIAL, MONUMENTS AND ARCHAEOLOGICAL SITES ("CULTURAL MATERIAL")

a. Setting clear quantitative targets for the digitisation of cultural material, in line with the overall targets mentioned under point 7, indicating the expected increase in digitised material in Europeana and the budgets allocated by public authorities

- Is a national strategy or other scheme in place for planning the digitisation of cultural material?

National strategy

National funding programme

Domain specific initiatives

Regional schemes

No specific scheme

Other

Please provide details of the **present** scheme, and any developments **since the last reporting period**.

Although there is no national scheme, the main stakeholders (National Archives of Malta, Malta Libraries and Heritage Malta) all have in-house plans for digitisation. These entities are planning future investment in systems required to maintain such digital assets and the capacity building needed. Furthermore, the main focus is the continuation of agreements that are currently in place. During the reporting period in question, the National Archives of Malta continued its collaboration with Hill Museum and Manuscript Library that commenced in 2007. By means of this agreement the necessary equipment and required personnel were funded by Hill Museum and the National Archives provided the space and manuscripts to be digitised. The programme of work includes digitisation of Law Courts' records, digitisation of traditional Maltese music funded by an NGO (Friends of the National Archives) and other various small in house digitisation projects focussing mainly on architect plans and maps. Heritage Malta continued to populate its information system with digital resources. It is currently conducting a market research to establish systems that are interoperable. Furthermore, Malta Libraries digitises material to provide access to its clients via its online portal service called DigiVault, which was made available to the public in December 2015. This platform is also used to export metadata to other platforms, including Europeana.

- Are quantitative targets for the digitisation of cultural material set at national level?

Please provide details for the reference period 2013-2015 including any available figures on digitisation targets and allocated budgets/budget sources.

No national quantitative targets are set, nonetheless, targets set for the Archives Portal Europe in the APEX project have been achieved and surpassed. Infact, a number of collections that are of relevance to Europeana such as digital volumes, historical photographs and items from the National Collection, have been delivered through this portal.

The selection of cultural material for digitisation has been carried out using two yardsticks: a) user requests, and b) physical condition of the originals (preservation). This priority list is managed by the Reader Services Division within the National Library of Malta. The service itself and dependent targets, such as the amount of material made accessible through the service, is managed by the National Bibliographic Office within Malta Libraries. The targets set for DigiVault by end of 2015 amounted to 60,000 pages. These targets were achieved and new targets for 2016 were set, including a 150,000 page-target to be made accessible online.

- Are qualitative targets for the digitisation of cultural material set at national level?

Please provide details of any **present** standards or guidelines, and any developments **since the last reporting period**.

The standards employed by Malta Libraries to date relate to the metadata schema used to make the digital assets discoverable, namely provided by the Dublin Core Metadata Initiative (DCMI), in view of the fact that this is a generic standard which can therefore be applied to material in various formats:publications, archives, sculptures, works of art, maps, plans, paintings and the such. Given that the collection at the National Library contains various materials, this standard ensures that online accessibility can be provided to all types;not only to the core business of the National Library, i.e. publications.

b. **Creating overviews of digitised cultural material and contributing to collaborative efforts to establish an overview at European level**

- Is a national scheme or mechanism in place for monitoring the digitisation of cultural material?

Yes [] No [x]

If yes, please provide details.

Despite the negative reply to the above question, there is a coordinated effort within the Ministry for Justice, Culture and Local Government, together with the National Bibliographic Office, to report on the digital assets that were made available to Europeana.

- Has your country encouraged and supported the participation of cultural institutions to the [ENUMERATE](#) surveys for the establishment of a European-level overview of digitisation data? Please provide details of actions **within this reporting period**, any related figures, and/or plans to support contribution in upcoming surveys.

Whilst Heritage Malta and the National Archives participate in ENUMERATE surveys, various entities have been informed about the project during conferences and encouraged to participate.

Heritage Malta conducted a Seminar whereby information about Europeana was disseminated and the main features of this project explained. This seminar was targeted to Governmental entities and private collectors..

The National Archives promotes Europeana through courses organised by the Faculty of Media and Knowledge Science at the University of Malta. Other initiatives include the dissemination of information via the National Forum of Archives.

2. PROGRESS ON PARTNERSHIPS BETWEEN CULTURAL INSTITUTIONS AND THE PRIVATE SECTOR IN ORDER TO CREATE NEW WAYS OF FUNDING DIGITISATION OF CULTURAL MATERIAL AND TO STIMULATE INNOVATIVE USES OF THE MATERIAL, WHILE ENSURING THAT PUBLIC PRIVATE PARTNERSHIPS FOR DIGITISATION ARE FAIR AND BALANCED, AND IN LINE WITH THE CONDITIONS INDICATED IN ANNEX I

- Have cultural institutions in your country entered into PPPs (including also partnerships with non-EU partners) for digitisation or for facilitating the access to digital cultural heritage?

Yes No

Please provide details of any major partnerships established **since the last reporting period**, compliance of the respective agreements with the conditions in Annex I of the Recommendation as well as contact details of the cultural institution involved.

The agreements that were in place in the previous reporting period are still in place. This includes the agreement with the Hill Museum and Manuscript Library and the Genealogical Society of UTAH.

3. PROGRESS ON MAKING USE OF STRUCTURAL FUNDS, WHERE POSSIBLE, TO CO-FINANCE DIGITISATION ACTIVITIES

- Is your country using, or planning to use, funding from the European Structural and Investment Funds for the period 2014-2020 for the digitisation of cultural material?

Yes No

If yes, please provide details of specific programmes, or large-scale projects, and respective amounts.

Malta Libraries has benefitted €155,333 from structural funds leading to the acquisition of equipment and the creation of the online platform through which Digivault is delivered.. Through the ERDF 109 – Digitisation Strategy and Framework for the National Library of Malta Project each document held at the National Library is being digitized. The digital assets generated by this Project can be accessed through <http://digivault.maltalibraries.gov.mt>

The Broadcasting Authority of Malta has signed a collaboration agreement with M3P Foundation (www.m3p.com.mt) through which they are seeking to preserve and make accessible all the audiovisual material that the Authority has amassed over the years on-line. This project is however still in its infancy and EU funding is being sought in this context.

4. PROGRESS ON WAYS TO OPTIMISE THE USE OF DIGITISATION CAPACITY AND ACHIEVE ECONOMIES OF SCALE, WHICH MAY IMPLY THE POOLING OF DIGITISATION EFFORTS BY CULTURAL INSTITUTIONS AND CROSS-BORDER COLLABORATION, BUILDING ON COMPETENCE CENTRES FOR DIGITISATION IN EUROPE.

- Has your country developed ways to optimise the use of digitisation capacity and achieve economies of scale, through pooling of digitisation efforts or cross-border collaboration?

Yes No

Please provide details of any developments or best practice examples of national, or cross-border, collaboration **within this reporting period.**

Malta Libraries has been advocating the concept of having a national portal providing access to cultural assets for the past four years. It also approached other institutions that would be interested in using DigiVault to provide access to material within their custody.

The current administration has created a project headed by the National Archives, with Malta Libraries engaged as a partner, thereby ensuring the pooling of resources on a local level. The portal would provide access to material from various entities albeit being restricted to archival material.

In addition, the National Archives of Malta was successful in pooling resources with American organisations. Most of its digitisation was carried out in collaboration with and mainly sponsored by the Genealogical Society of Utah, the Hill Museum and Manuscript Library and the US Holocaust Museum.

Furthermore, Heritage Malta pooled resources in collaboration with private and other public entities. This includes digitisation and cataloguing of material compiled by Foundations such as the Maltese Heritage Foundation: *Fundazzjoni Patrimonju Malti*. Also, Heritage Malta maintains digital assets that are of

historical value or are a true copy of items within the national collection which are produced by private individuals such as professional photographers. These individuals are thus sensitised as to the dissemination of such assets to the Europeana network.

DIGITISATION AND ONLINE ACCESSIBILITY OF PUBLIC DOMAIN MATERIAL

5. PROGRESS ON IMPROVING ACCESS TO AND USE OF DIGITISED CULTURAL MATERIAL THAT IS IN THE PUBLIC DOMAIN

- a. Ensuring that material in the public domain remains in the public domain after digitisation
- Has your country encountered obstacles in the process of ensuring that material in the public domain stays in the public domain after digitisation? How do cultural institutions in your country take up the Europeana Public Domain Charter? Please provide details of the **present** situation and any developments **within this reporting period**.

No such obstacles were encountered.

- b. Promoting the widest possible access to digitised public domain material as well as the widest possible reuse of the material for non-commercial and commercial purposes
- Are there projects or schemes for promoting the widest possible access to and re-use of digitised public domain material? Please provide details of any developments **within this reporting period**.

During this period no definite results can be reported since the service was launched at the end of the period covered. However the service will be marketed during 2016. Additionally, through the participation in TEL and Europeana, it is envisaged that new clients will be incorporated.

Nonetheless, it is important to note that Heritage Malta participated in CARARE (archaeological material and 3D models of prehistoric structures), STERNA (artefacts from the national collection related to natural science and ATHENA (artefacts from the national collection related to fine arts).

What experience has your country been able to gather concerning the re-use of digitised public domain material for non-commercial or commercial purposes? Implemented various projects such as CARARE, STERNA, ATHENA etc..

- Please provide details of **any best practice examples within this reporting period**. Please also indicate whether there are mechanisms for monitoring such reuse (take-up by organisations engaging in re-use and take-up by end-users/visitors).

Given the short timeframe and lack of direct investment in the field, it would be premature to indicate that experience in this sector was gathered. The National Archives is using its collaborative networks through European Branch of the International Council on Archives (EURBICA), International Council on Archives (ICA) and European Archives Group (EAG) to analyse how other Member States'

best practices can be applied to Malta. There is no fixed mechanism for monitoring such reuse in place as yet.

c. Taking measures to limit the use of intrusive watermarks or other visual protection measures that reduce the usability of the digitised public domain material.

- Are measures to limit the use of watermarks or other visual protection measures reducing the usability of digitised public domain material in place?

Yes [] No [x]

Please provide details of any developments **since the last reporting period..** Where applicable, please also indicate best/worst practice examples.

No measures are as such in place to limit the use of watermarks across the board (National Libraries, National Archives and Heritage Malta), nonetheless the National Archives only utilises watermarks where the assets are provided by third parties that are bound by particular licensing issues.

DIGITISATION AND ONLINE ACCESSIBILITY OF IN-COPYRIGHT MATERIAL

6. IMPROVE CONDITIONS FOR THE DIGITISATION AND ONLINE ACCESSIBILITY OF IN-COPYRIGHT MATERIAL.

a. Rapid and correct transposition and implementation of the provisions of the Directive on orphan works

- Has your country adopted legislation to transpose the Directive on orphan works?

Yes [x] No []

Please provide details of any developments **since the last reporting period.**

The transposing legislation is entitled: 05 *Certain Permitted Uses of Orphan Works Regulations* which may be accessed via the following link:<http://justiceservices.gov.mt/DownloadDocument.aspx?app=lom&itemid=12255&l=1>

—

b. Legal framework conditions to underpin licensing mechanisms identified and agreed by stake-holders for the large-scale digitisation and cross-border accessibility of works that are out-of commerce.

- Are there any legal/voluntary stakeholder-driven schemes in your country to underpin the large- scale digitisation and cross-border accessibility of out-of-commerce works?

Yes [] No [x]

Please provide details of any developments **since the last reporting period** (including schemes, references and impact).

N/A

c. Contributing to and promoting the availability of databases with rights information, connected at the European level, such as ARROW.

- Is your country contributing and promoting the availability of such databases at the European level?

Yes [x] No []

Please provide details of any developments **since the last reporting period**.

Heritage Malta has made data freely available via its Portal and Europeana. (<http://heritagemalta.org/projects/eu-funded-projects/>)

The National Archives has also made data freely available on the Archives Portal Europe (www.archivesportaleurope.eu).

In the case of Malta Libraries, the European initiative is locally led by another institution (as indicated above).

Once the training commences, contribution directly through a European initiative will follow.

EUROPEANA

7. PROGRESS ON CONTRIBUTION TO THE FURTHER DEVELOPMENT OF EUROPEANA

- a. Encouraging cultural institutions as well as publishers and other right holders to make their digitised material accessible through Europeana, thus helping the platform to give direct access to 30 million digitised objects by 2015, including two million sound or audio-visual objects
- Please provide details of any developments, or best practice examples, **within this reporting period.**

In December 2015, the National Bibliographic Office provided metadata to TEL, being its Europeana aggregator. This collection represents a prototype of the ingestion method that will be employed. National Libraries are expecting TEL's confirmation that digestion in its portal can proceed. When this is concluded, it will take some weeks until Europeana's harvestors will ingest the data from TEL. The prototype file contains 25,000 pages representing the National Library's Incunabula Collection. Once the methodology required for ingestion is confirmed from TEL, additional exports will be carried out as part of our business process.

Heritage Malta, through various projects such as CARARE, ATHENA and STERNA, as well as the National Archives, have made available a number of items to Europeana. Both Heritage Malta and the National Archives provide expertise in digitisation and digital cultural material to other stakeholders to assist in the supply of digitised material to Europeana.

Nonetheless, there is a concern in that institutions do not have the funding or any other support for such initiatives.

- Please provide figures concerning the contribution of your country to Europeana with regards to the indicative targets for minimum content contribution by 2015, as set at Annex II of the Recommendation.

By 2015, the National Archives made available to Europeana, through the Archives Portal Europe, c.100 digitised volumes and c. 1600 digitised historical photographs through Archives Portal Europe. Heritage Malta also made available c.3,000 digitised images and 845 historical photographs to Europeana through the Heritage Malta website portal. The Malta Libraries contributed 25,000 pages of text to TEL.

- Are there known obstacles that have prevented your country from reaching the indicative targets for 2015? **(if relevant)**

At present, the main source of funding made available to such entities is through third-party means. The use of EU funding is deemed crucial in order to carry through our objectives.

b. Making all public funding for future digitisation projects conditional on the accessibility of the digitised material through Europeana.

- Please provide details of any steps taken, or best practice examples, **within this reporting period.**

N/A

c. Ensuring that all their public domain masterpieces will be accessible through Europeana by 2015,

- Please provide details of any steps taken, or best practice examples, **within this reporting period.**

The best practice example that is worthy of note is that the Malta Libraries provided assets to its aggregator throughout 2015, which, as previously indicated, will be made available to Europeana during 2016.

d. Setting up or reinforcing national aggregators bringing content from different domains into Europeana, and contributing to cross-border aggregators in specific domains or for specific topics, which may bring about economies of scale

- Is a national aggregator bringing content from different domains into Europeana present in your country?

Yes [] No [X]

- Please provide details of any developments, **within this reporting period,** concerning national aggregators, participating organisations and content domains covered.

N/A

- Please provide details of any developments or best practice examples, **within this reporting period,** concerning contribution to cross-border aggregators in specific domain or for specific topics.

N/A

e. Ensuring the use of common digitisation standards defined by Europeana in collaboration with the cultural institutions in order to achieve interoperability of the digitised material at European level, as well as the systematic use of permanent identifiers

- Please provide details of any steps taken, or best practice examples, **within this reporting period**, to ensure the use of common digitisation and metadata standards to achieve interoperability at European level.

National Archives use the Archives Portal Europe dashboard EAD (encoded archival description) and the images attached can be easily converted to EDM and delivered to Europeana.

Heritage Malta uses GETTY standards / EDM to ensure interoperability

Transposition of data and reuse is possible by Malta Libraries since internationally endorsed standards are being used. Additionally, using the services of TEL ensures that data arrives to Europeana in Europeana Data Model (EDM).

- Please provide details of any developments or best practice examples, within this reporting period, concerning the systematic use of permanent identifiers.

A strategy is being discussed by the National Archives for the possibility of using persistent identifiers but the strategy is still in the discussion stages and thus not yet implemented. In this framework, the National Archives of Malta (NAM) is in close collaboration with the Government's national IT agency MITA.

f. Ensuring the wide and free availability of existing metadata (descriptions of digital objects) produced by cultural institutions, for reuse through services such as Europeana and for innovative applications

- Which steps has your country taken to ensure the free availability of existing metadata? How do cultural institutions in your country take up the Europeana Data Exchange Agreement? Please provide details of any developments or best practice examples, **within this reporting period**.

The National Archives, Heritage Malta and the Malta Libraries signed the Europeana Data Exchange Agreement.

- What experience has your country been able to gather concerning the re-use of free metadata, through services such as Europeana or for innovative applications? Please provide details of **any best practice examples within this reporting period**.

National Archives of Malta and Heritage Malta staff acquired skills required to manage metadata and its conversion to various formats including Europeana Data Model (EDM). There is no national framework or support structure for this.

- g. Establishing a communication plan to raise awareness of Europeana among the general public and notably in schools, in collaboration with the cultural institutions contributing content to the site
- Please provide details of any developments or best practice examples, **within this reporting period**.

The National Archives of Malta developed a plan to disseminate APEX in schools as it was part of the dissemination commitments it had in that project. However, as APEX is an aggregator for EUROPEANA, indirectly this is also giving an opportunity to disseminate information about EUROPEANA in schools.

Heritage Malta is adopting various methods, including social media and lectures in museums and sites.

DIGITAL PRESERVATION

8. REINFORCE NATIONAL STRATEGIES FOR THE LONG-TERM PRESERVATION OF DIGITAL MATERIAL, UPDATE ACTION PLANS IMPLEMENTING THE STRATEGIES, AND EXCHANGE INFORMATION WITH EACH OTHER ON THE STRATEGIES AND ACTION PLANS.

- Does your country have a strategy for the long-term preservation of digital material? What actions are you planning to implement the strategy? Have you exchanged information with other Member States in order to devise your strategy and action plan? Please provide details of **any developments since the last reporting period**.

The conversion of existing data to EAD xml and the newly generated cataloguing being stored in this format ensures that the data is not reliant on any specific technology, either hardware or software.

Metadata can be preserved since standards used ensure migration and/or forward compatibility. The digital assets themselves are stored using the format which is currently a defacto market standard. However, it must be said that a robust strategy on such work has not been drafted.

9. EXPLICIT AND CLEAR PROVISION IN YOUR COUNTRY'S LEGISLATION SO AS TO ALLOW MULTIPLE COPYING AND MIGRATION OF DIGITAL CULTURAL MATERIAL BY PUBLIC INSTITUTIONS FOR PRESERVATION PURPOSES, IN FULL RESPECT OF EUROPEAN UNION AND INTERNATIONAL LEGISLATION ON INTELLECTUAL PROPERTY RIGHTS.

- Have your country made explicit and clear provision in its legislation to allow multiple copying and migration of digital cultural material by public institutions for preservation purposes? Please provide details of **any developments since the last reporting period**.

The legal provision which can be adopted lies within Art. 32 of the Malta Libraries

Act. (Act VII of 2011:

<http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lp&itemid=22133&l=1>).

10. MAKE THE NECESSARY ARRANGEMENTS FOR THE DEPOSIT OF MATERIAL CREATED IN DIGITAL FORMAT IN ORDER TO GUARANTEE ITS LONG-TERM PRESERVATION, AND IMPROVE THE EFFICIENCY OF EXISTING DEPOSIT ARRANGEMENTS FOR MATERIAL CREATED IN DIGITAL FORMAT.

- a. Ensuring that right holders deliver works to legal deposit libraries without technical protection measures, or that, alternatively, they make available to legal deposit libraries the means to ensure that technical protection measures do not impede the acts that libraries have to undertake for preservation purposes, in full respect of European Union and international legislation on intellectual property rights.
- What arrangements has your country made to ensure that technical protection measures do not impede the acts that libraries have to undertake to guarantee long-term preservation of material created in digital format? Please provide details of **any developments since the last reporting period**.

Entities are taking individual provisions for long-term preservation. Heritage Malta are abiding by W3C standards. On the other hand, the National Archives are in the process of investing in a dedicated server to link with APEX. Through this move, other digital assets in hand, such as the National Memory Project and Oral History project, will be hosted on this system. The content of this server will be backed up in an infrastructure for long term preservation.

- b. Where relevant, making legal provision to allow the transfer of digital legal deposit works from one legal deposit library to other deposit libraries that also have the right to these works.
- Has your country made legal provision to allow the transfer of digital legal deposit works from one legal deposit library to other deposit libraries that also have the right to these works? Please provide details of **any developments since the last reporting period**.

No developments to report.

- c. Allowing the preservation of web-content by mandated institutions using techniques for collecting material from the Internet such as web-harvesting, in full respect of European Union and international legislation on intellectual property rights.
- What measures has your country adopted to allow preservation of web-content by mandated institutions? Please provide details of **any developments since the last reporting period**.

No developments to report

11. TAKING INTO ACCOUNT DEVELOPMENTS IN OTHER MEMBER STATES, WHEN ESTABLISHING OR UPDATING POLICIES AND PROCEDURES FOR THE DEPOSIT OF MATERIAL ORIGINALLY CREATED IN DIGITAL FORMAT, IN ORDER TO PREVENT A WIDE VARIATION IN DEPOSITING ARRANGEMENTS.

- How is your country taking into account developments in other Member States in order to prevent a wide variation in deposition arrangements? Please provide details of **any developments since the last reporting period**.

The National Archives are participating fully in The European Board of National Archivists (EBNA), European Archives Group (EAG), Digitisation of Culture Heritage Expert Group, Archives Portal Europe Foundation and keeping abreast of developments.

Deposit of the material that was produced digitally and not in any other format, has not yet been implemented by the National Library. Publications are obliged to be deposited by law so as to ensure that copies are kept for posterity. Material which is not published on paper but born digital is covered by law but the provision is not yet implemented.

IS THE RECOMMENDATION UP TO DATE AND FIT FOR PURPOSE?

THE RECOMMENDATION IS A NON-BINDING EU LEGAL ACT WHOSE PURPOSE IS TO COORDINATE, SUPPLEMENT AND SUPPORT MS' ACTIONS IN AN AREA WHERE THE EU HAS NO CENTRAL COMPETENCE. IN THIS CONTEXT:

- What are your views on the overall usefulness of the Recommendation as an instrument to improve conditions, in the areas addressed therein, in your country?

From a policy aspect, the recommendation is highly relevant. However, its implementation is often hindered due to the mismatch of funding and resources to implement it fully.

- Which provisions of the Recommendation do you consider to have had high impact in your country?

The major contribution of the Recommendation so far was to instil dialogue and collaboration between key figures in institutions. Whilst specific domain issues became evident, and apart from cross-domain hurdles such as limited resources, every key institution was able to take stock of the current situation at the national level and possibly this will give rise to better national effort and pooling of resources.

- Which provisions of the Recommendation do you consider to have had low impact in your country?

The aspect of re-use of information is still not well understood and acknowledged and therefore not backed up by the required resources.

- Would the Recommendation benefit from an update to enhance its impact or bring it up to date with current challenges so that it remains relevant in the coming years? Please provide your suggestions or comments with respect to specific provisions or in general.

Not at this stage.

ANY OTHER BUSINESS

- Please indicate in the box below any suggestions or other comments you would like to make, or any further information you consider of use for the purposes of this progress report and/or the further implementation of the Recommendation.

N/A