

Registration Standards for Museums and Galleries

Response to consultation by Resource

from

The Joint Public Affairs Committee, convened by the United Kingdom Institute for Conservation

The Registration scheme has been a considerable success, both encouraging and recognising higher standards in museums and galleries in the United Kingdom. We welcome its continuation and the introduction of these revised standards.

In general we are in agreement with the contents of the standards, and mainly draw attention only to specific points.

Summary of our main points

1. **More emphasis is required on continued monitoring of standards after initial registration.**
2. **A museum which only meets Basic Practice levels of Collection Management should demonstrate that it is working towards achieving Good Practice. In effect Basic Practice should be clearly seen as a stepping stone to Good Practice.**
3. **The *Benchmarks in Collection Care*, which were prepared for other purposes, need to be reviewed for consistency and as a tool for setting Registration criteria.**
4. **Improved *Benchmarks* require advocacy by Resource and greater earmarked funding for their implementation.**
5. ***Standards in the Museum Care of Collections* need to be better promoted by Resource within this scheme.**
6. **The apparent imbalance between requirements for documentation and collection care needs to be corrected.**
7. **The eligibility criteria for Curatorial Advisers should allow for conservation qualifications, whilst requiring also familiarity across all museum functions.**
8. **It should be a requirement that external conservators and conservation advisers are PACR (or equivalent) accredited and if from the private sector are on the Conservation Register.**
9. **There should be greater emphasis on staff development.**
10. **We wish to see the glossary definition of “conservation” brought into line with internationally agreed definitions.**
11. **The standards specific to “national” museums need to be more rigorous.**

DETAILED COMMENTS

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We welcome the use of the term “Standards” to replace “Guidelines” since it more accurately reflects the nature of the process: meeting standards to achieve registration status.

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Monitoring and Quality Assurance

We are concerned that Registered museums which met standards for collection care at the time of their registration may not do so any longer. We could cite examples of Registered museums with wholly inadequate storage conditions. Consideration should be given to a regime which ensures that Registered museums maintain the standards for which they have been registered.

We welcome the meshing of review timetables with museums’ own planning cycles (provided these are sufficiently frequent), because this will ease the burden on museums, and thus encourage greater co-operation. We note that this is mainly a paper exercise and we should like to see a strengthening of the quality assurance regime as here proposed. The SRAs and Hubs should be well placed to assist with this.

3.4 Possible Future Improvements

To the list could be added

- Schedule of improvements to publications programme
- Schedule of improvements to website

The document as a whole makes scant reference to electronic media as a form of access.

5. Collections Management

5.1 Requirements

There is an imbalance in the list, with a disproportionate emphasis on documentation. Hence the *three* items 5.1.2, 5.1.3 and 5.1.4 could be combined into a single requirement. This would bring documentation into balance with Acquisition & Disposal Policy, Collection Care and Security.

5.1.6 and 5.2.6.1 “Review to take place every five years.” This seems a good suggestion to maintain security, but we cannot see why a similar requirement is not made for the other aspects of collections management. Looking to those museums *already* registered, if such a museum has not progressed in five years from what is now termed Basic Practice collection care, consideration should be given to not renewing its registration. Looking to the future, we would expect convincing evidence that Good Practice is being actively worked towards, if not already achieved.

5.1.5 and 5.2.5 Collection Care “Collection care to Basic Level as defined in *Benchmarks in Collection Care.*”

It makes sense to incorporate the *Benchmarks* as a building block to the Registration Standards. The *Benchmarks* Document is already proving an important tool, but it needs both review (see below) and stronger advocacy by Resource. The new Registration Standard will be an important step towards this, but the *Benchmarks*, which were not designed for this purpose, but in the main to integrate standards from across all three domains, need to be adapted for effective use as a Registration tool

While we recognise the importance of there being a defined Basic Practice Level to help characterise and encourage some small, poorly resourced, possibly volunteer-run museums, often at the start of their existence, this level should not be promoted a sufficiently high standard for continued Registration. It should be a requirement that museums demonstrate how they are working towards achieving Good Practice if this is not achieved at the time of Registration.

We believe the *Benchmarks* to be inconsistent in several respects and in need of review, in which the conservation and collection care community would be happy to advise.

For present purposes we note the following examples from *Benchmarks* to indicate why “Basic Practice” is not good enough for continued Registration.

2 Buildings

2.1 Fabric

It is only at the **Good Practice** level (2.1.5) that “The building in which the collection is housed is wind-proof and watertight and can provide basic protection for the collection”. The implication is that **Basic** standards do not require a weatherproof building to provide basic protection. The **Basic** requirements are merely that floor-loadings are not exceeded and that buildings defects are identified and assessed, but not remedied.

2.1.6 Similarly it is **Good Practice** that “A schedule for the routine maintenance of buildings and utilities is in place” So **Basic** practice does not even require a routine maintenance regime, and this is surely not good enough to merit continued Registration.

2.2 Security

2.2.8 It is proposed as **Good Practice** that “access to keys and security codes is strictly controlled”. By implication **Basic** practice does not require such a fundamental precaution

6.3 Light

6.3.7 It is proposed as **Good Practice** that “Potentially harmful electric light sources are not placed close to collections”. By implication, at **Basic Level** it is alright to place harmful electric light sources close to collections. This is not good enough for Registration.

There are a number of similar anomalies in the *Benchmarks* as well as inconsistencies between different areas (i.e. vertically in the document) in what is thought of as basic as opposed to good practice. In many cases it is impossible to discern why some recommendations should have been denoted as basic and others good practice. We can see little merit in endorsing such minimal standards as are implied by *some* of the current Basic Practice benchmarks

5.2.5.1 We welcome this recognition of the centrality of collection care to access to collections.

5.2.5.2 defines the Levels:

- **Basic Practice** – a minimum level of practice which all museums, archives and libraries should be able to achieve.
- **Good Practice** – a standard that is achievable by the majority of institutions. This level represents a consensus of current professional good practice, tempered by realistic expectations.
- **Best Practice** – the highest standards to which a museum, archive or library can aspire. It reflects a consensus of professional practice, much of which is enshrined in published standards, such as BS 5454:2000 and the *Standards in the Museum Care of Collections* series.

This further confirms our view that **Good Practice** is the appropriate target standard to set for Registration, even though it may not be achievable by some registered museums in the short term. While we recognise the need to define **Basic Practice**, it provides insufficient incentive for Registered museums to progress in the management of their collections.

The level of **Basic Practice** does not compare with the distinctly higher standard being set here for Documentation, which is more in line with the Benchmarks' **Good Practice**. This inconsistency also needs to be addressed.

Standards for the Museum Care of Collection series: These important standards, developed over several years, need greater recognition as a working tool, in parallel with the *Benchmarks in Collection Care*. In many respects the standards set in those documents should comply with the level of **Good Practice**, rather than that of **Basic Practice**. The *Standards* require greater advocacy by Resource

The *Benchmarks* document is an extensive working tool. Without having it to hand, the reader of this Registration Scheme document will have no idea of what is implied. Indeed, without conservation expertise to hand, they would find it difficult to interpret with any confidence. It would be extremely helpful if a summary of the main headings from the *Benchmarks* were to be included in this Registration Scheme document, as an appendix, just as other cross references are tabulated e.g. Spectrum documentation and Security standards.

We question how the Benchmark standards will be assessed and delivered. Theoretically, unless there is a conservator collection care manager in-house, external

assistance will be called in to do the survey. But what support is there for this? We doubt whether conservators are sufficiently aware of the benchmarks. They could be a target for Resource's advocacy programme and we should be happy to advise. Use of the *Benchmarks* should be supported by Resource by developing regional opportunities for conservators and collection care managers to bring them into practice. We recommend funding be put aside (both by Resource and by the SRAs etc) for training conservators and collection care managers in carrying out Benchmark surveys, within the context of Resource's Workforce Development strategy.

Size

“The benchmarks describe the quality and breadth of collection care activities. They are not dependent on the size or type of institution, the nature of the collections or the staffing levels, although these factors inevitably influence how individual institutions approach collection care.”

It is unclear what is meant by this, especially the final phrases. Is it not appropriate to say that the larger the collection the more staff are likely to be required in order to maintain the standards?

We note that the *Benchmarks* already embrace standards in Acquisition and Disposal and wonder how those standards articulate with the standards now being proposed within the registration scheme. Users may need guidance on which standards have priority.

5.3 “basic Practice” in *Benchmarks* We have already commented on this.

“expert advice on security...within the last five years” We have also commented on this, to the effect that a five year regime could also be required for review of collection care, although proof would also be required of on-going maintenance of standards.

6 Staffing

There could be reference in this section to the Staffing content within the *Benchmarks in Collection Care* document.

6.2.1.2 This paragraph refers three times to having staff to meet “responsibilities”, when it might be more appropriate to refer to having staff capable of meeting the registration standards. “Responsibilities” are otherwise too vague.

6.2.2.1 We welcome this recognition of the need for access to appropriate staff.

6.2.2.2 While we recognise that the valuable regime of Curatorial Advisers has been in operation for some time, we should like to draw attention to the possibility that this role could sometimes equally well be taken by a qualified conservator. There are now many examples of conservators operating over a far wider range of museum responsibilities. The former Chief Executive of Resource, a conservator, was a highly successful Director of the National Museums of Wales.

Without necessarily revising the well-established term “Curatorial Adviser” it should be possible to extend the range of requirements (second bullet point) from “ a relevant degree or diploma in museum studies (or equivalent)” to “a relevant post-graduate qualification in museum or conservation studies (or equivalent)” Conservators like curatorial colleagues would have to demonstrate familiarity with the full range of museum functions, but would not be required to hold an AMA if already conservation-accredited.

6.2.2.5 Specialist staff. Curators are not included in this list and should be. Curators are just as much specialist staff as the others listed.

While standards have been promoted in 6.2.2.2. for curators and curatorial advisers, it is just as important to set meaningful standards for the specialist staff whom they employ or to whom they have access.

In the case of conservation personnel we strongly recommend that all external conservators and conservation advisers are (a) PACR Accredited (or equivalent, see below) and (b), if in the private sector, are members of the Conservation Register, the national database of conservators, initially created by the MGC, and now operated by UKIC in collaboration with Historic Scotland and the NCCR, and funded among others by Resource. (Peter Winsor is on its Advisory Board)

There are other accreditation schemes apart from PACR, and work is currently proceeding to draw these together into a single professional standard under a Common Accreditation Framework. For the time being, the above reference will suffice.

6.2.3.4 Training: This paragraph seems very weak, in view of the long-recognised and urgent need to improve museums’ commitment to training and staff development. It is also weak in relation to Resource’s own Workforce Development strategy. This section needs considerable strengthening, to encourage staff development, supporting continuing professional development, putting funds aside to support training, staff working towards NVQs, and their accreditation. It is important that all of this is embedded within the registration standards.

6.2.3.5 Volunteers. It is good that there is a reference to the need for management and co-ordination. However, there is much work and have been several initiatives to improve practice in this area (driven by MGC or Resource), including training for volunteers, and reference should be made to these.

6.3 Documentary evidence should also be provided in relation to the specialist internal and external staff, including evidence of qualifications, accreditation, experience and CPD.

6.4 Possible Future Developments

Add

- Collection care training for all staff with access to or having an impact on collections

Under

- Arrangements for formal development
Add “CPD, accreditation”

Under

- Progress with implementation of additional professional advice
Delete “additional”.

Appendix 1 A

Making accessible This also includes conservation, not currently listed. The point is that conservation is just as essential to providing good access as the other items listed (e.g. documentation, research, publication)

Appendix 1B

Glossary

We question the need for this. Many of the terms are already widely understood by the expected readership and accepted in the museum world. It may be superfluous for Resource to try to come up with its own definitions of terms.

Access The definition given here is very restricted, reflecting solely on barriers to access, especially to the disabled. Access has far wider connotations, as Resource must be aware.

Collection care It is difficult to distinguish the definition for this from that given later for **Preservation**.

Conservation We find the definition given here (and in *Benchmarks* page xii)) narrow and limiting. We recommend that the ECCO and ICOM-CC definitions be used instead. For the “lay” reader, it might be helpful to include the terms “interventive” and “preventive” in any further exploration of the term.

Preservation See comment above re **Collection Care** We are puzzled as to why Preservation should only include “providing for conservation treatment”, and not “conservation” itself.

UKIC and its sister organisations would be happy to assist in improving on the definition of the above terms. However, as mentioned, we doubt whether it necessary or appropriate for there to be a glossary.

Appendix 2

It would be helpful to list separately the individual *Standards in Collection Care* and *MGC Guidelines*.

The listing could be made more helpful by grouping the content, since in its alphabetical format it is very difficult to locate publications on any particular topic. It reads more as a compendious card index than an aid to achieving standards.

SORP 2000 Some explanation might be helpful

Appendix 3 Requirements for museums using “national” and equivalent words in their names

5a “...These collections must be subject to appropriate standards of care”

To be meaningful in the context of this document the appropriate standards of care must be specified. If the standard is to be higher than that implied by ordinary (non-“national”) registration, then it will have to be at least **Good Practice** level.

“The museum must have adequate resources and commitment to conserve and preserve them.” This too could be given more substance to make it meaningful.

5e It should offer visitor services of a quality appropriate to a museum purporting to provide a national facility. Since this is being required of a museum calling already itself “national” the requirements appears to be self-fulfilling or self-defeating.

7 New applications Is it possible for an application from a “national” museum to be considered “routine in nature”? It would appear that all such applications should be considered by the Conservation Committee, not the Panel.

Appendix 5

To

- Compiling a manual and keeping it up to date
- Add “with the help of external expertise, as necessary”

In

- Contact details of staff to be telephoned in case of an out of hours emergency
- Insert “and external consultants and advisers” (available from the Conservation Register)

It would be helpful to cite some references for this appendix.

Appendix 6 Acquisitions & Disposal Policy

(see comments above re duplication with *Benchmarks*)

4. Limitation on collecting

We welcome this recognition.

It might be helpful to insert a reference to time-scale, e.g. in the medium to long term or “in perpetuity”

Response prepared by UKIC, on behalf of the Joint Public Affairs Committee (including the Institute of Paper Conservation and the Scottish Society for Conservation-Restoration) with representation from the National Council for Conservation-Restoration, to all other members of which the draft of this document has been circulated, including the Care of Collections Forum whose comments are here taken into account.

26th June 2003