

Study Name: How do ethics influence the development of policies for accessing public collections which are essentially restricted by law: A case study of the Royal Armouries.

Depositor: Stuart Bowes

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**Interview Transcript: Jen Kaines – Head of Collections Services (Royal Armouries),
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SB: Hello. Thank you very much for joining me again today, Jen. I was just hoping to continue some of the conversations we had last time, moving on to governance frameworks and the Armouries' collections. So just to start off with, what would you consider to be the principal restrictions placed on the Armouries' weapons collections by frameworks that seek to regulate museum practice more generally?

JK: Well, starting from the top. All the legal frameworks and, I guess, the first one that started and controls us is the *National Heritage Act 1983*, which basically outlines what we are, what we should be doing, and the kind of collections that we hold and all of that. So that outlines where we are and the clear governance around how we are constituted as an entity or an organisation. Now, that being said, it's interesting, isn't it, because we're not down as the Royal Armouries in that document at all, so we're listed as the Armouries and Board of Trustees of the Armouries. It's only latterly and not very clearly how and when we became the *Royal* Armouries, but that's how we're constituted. That's the first one that we would look at in terms of our broader governance framework. Then there's the specifics around the collections that we hold and most of that legislation, as I think we discussed previously, isn't necessarily coming out of DCMS [the Department of Culture, Media and Sport] in terms of where we're governed. So obviously there's all the cultural aspects around how we're constituted as a national museum and all those frameworks in terms of national museums. Then in terms of the specifics, the kind of collection that we hold, it's all the firearms legislation, and knife and gun legislation that has come out of various other government departments, most of which in relation to those are Home Office-related and those are the clear legal frameworks that we operate under. Then there's the ethical frameworks as well adjacent to and over the top of those in terms of how we operate. Those are national but also international frameworks in terms of how we manage those collections and what we do with them.

SB: Are you speaking of things like the Museums Association *Code of Ethics* and the ICOM [International Council of Museum] *Code of Ethics* there?

JK: Yeah, those ones definitely in terms of how we operate. So international, ICOM and ICOMAM [International Committee for Museums and Collections of Arms and Military History] in terms of the arms and armour branch of ICOM as well in terms of those codes of ethics and best practice standards really. The things like the museums' code of ethics, Museums Association *Code of Ethics*, doesn't necessarily mention very specifically firearms, but it's in terms of that they're always deemed to be more hazardous collections. Whilst we wouldn't necessarily consider the firearms to be hazards in themselves, they have got hazards within them usually. The differences of how we look at firearms and how other museums might look at firearms is that other museum collections will deal with them as a hazard in their own right, a firearm is a hazard. Whereas for us, the firearm per se isn't a hazard, it's the things within it, so the sprung mechanisms or the asbestos or radiation that they hold within themselves in terms of material type, rather than a firearm being a hazard. If that makes sense.

SB: That makes clear sense. When you're referring to the risk assessments, from what I've seen, firearms isn't a specific one, but you do have radiation and that sort of thing. So that makes a lot of sense. I was just thinking, how do these overarching frameworks interact with more museological collection-based frameworks? So I'm thinking something like [Museum] Accreditation or something like PAS 197 *The Code of Practice for Cultural Collections Management*, things like that, which take that broader collections view rather than a legislative view or a particularly ethical view.

JK: Again, none of those things that you refer to in terms of PAS 197 or accreditation mention firearms specifically or edged weapons specifically. It's all in terms of collections management best practice. That's quite interesting in itself, and I think that that's for two reasons, partly because firearms are objects in themselves and they just have those inherent hazards, as we've mentioned, but also those additional legislative frameworks that we would need to work around. But they are simply objects and I guess that's why accreditation and PAS 197, it's not mentioning them specifically as a collection type. In that, if you had to mention any collection type that had a specific legislative framework attached to it, those documents would start to become unwieldy. I'm thinking in terms of human remains, you'd need to have a whole section on the *Human Tissue Act* [2004] and various legislation around that. So in a way, they are objects of an object type, they're not anything very special in that sense. So collections, they're

simply objects in many ways, and I think we see them as such, or a lot of us see them as such. I think it's when you are dealing with them in smaller museums sometimes where you're not routinely dealing with them, and therefore you feel that because they've got that added legislation, they have an added burden to them by looking after them, if that makes sense.

SB: Yes, I suppose it's not part of the normal processes and procedures that you're going through, it's a whole different policy and legislative framework that you're having to deal with. I'm not sure quite what the procedures are at Leeds Museums and Galleries, but I can imagine that's the case because I know they've got a small collection of weapons there.

JK: Yeah, and I think that's the thing. I guess they're more restricted access and obviously we have restricted access. I guess their restrictions are even more so than we have in that most of our collection staff who've gone through our collection security training will have independent access for good reason, for business reasons, independent access to those firearms stores.

Whereas at Leeds Museums, unless it's changed in the last four years, which it might have done since I worked for them, it was always very much like the registrar had access because they were the named individual and understood everything, and that was kind of it. It was very much more controlled because there is a broader lack of understanding and you put that training in place in terms of the collection security. So for us, we make sure that colleagues are aware within that collection security training, which I know you've undertaken, about what your role and responsibility is, and that handling aspect as well of handling weapons. You're making sure that it's not loaded. You're not pointing it at somebody, which for us in a day-to-day thing that's familiar because we deal with those objects all the time. It's not familiar for those members of museum collections staff who wouldn't necessarily be handling firearms on a daily basis. Whilst you would hope that people don't point guns at each other, that seems to be common sense in many ways. I don't know if it is common sense, and I think it's so far out of most people's everyday existence that they're not used to picking up firearms or swords in the way that actually you might be used to picking up social history objects in terms of mugs or pictures, or other things because those are in your everyday lives. Whereas most people I think in the UK, in the course of their daily lives, they're not handling guns and they're not handling swords in the same way. So I think some of that's key. But I think it's interesting that those more collections management [frameworks] aren't raising those collection types as anything different necessarily

than anything else. They are objects, and they're complex objects, mostly because they're composites in terms of their material types and their potential hazards in that sense. But the entity in themselves not so much, and they don't need to be very specifically mentioned within that collections management framework. Other than for us in terms of legislative purposes, making sure the serial numbers are recorded, calibres are recorded for the [Museum] Firearms Licence, it's not an over and additional burden. Most of the time, because we are managing those collections in a generic collections management way in terms of best practice – in terms of we know what it is, it's got a name, it's got a number, a unique identifier, it's got a location. It's all good collections management and it then meets the firearms legislative requirements as well.

SB: Yes, and it's quite useful that there's that overlap there. Are there any areas where, due to the proportional nature of the collections management framework, saying more sensitive items, you need to be aware that you might need to put more precautions in place? Are there any areas where it goes above the requirements of the legislation. Or is it very much they're generally one and the same and the legislative requirements are more stringent?

JK: Most of the legislative requirements are slightly more stringent than the collections management stuff that you would put in, and most of that's around the security, the physical security of those objects in terms of the different sections of weapons, and therefore what their physical constraints are in terms of where they're stored. That's the key thing. Whereas collections management terms, any object should have as much information as any other object. But in terms of the firearms legislation, it's more around additional items. So for serial number, whereas we may not have a serial number because some of the items are so old they don't have a serial number, but we would have a unique identifier. So being able to identify each item uniquely is what the firearms legislation, again, is asking for actually, and it happens to be that most of the time because the firearms legislation is written for modern weapons, current weapons, they will have a serial number. So asking for a serial number and/or an accession number is the same really. That's why, in a way, when the police forces come and inspect us actually, I mean they're very thorough, but they're usually fine with us in terms of how we document them because they know there's a level of best practice in terms of how we document everything. We know that we have to keep very good up to date location details. We know where everything is. We audit the collection regularly. All of those things means that they're assured

that we've met all the firearms legislative frameworks and the details within that. So I think, in my experience anyway, with the three police forces that we're dealing with at the moment within Royal Armouries, they're all usually like, we know you've got everything, you know where everything is and that's great, and you know it's secure and you always go over and above what we would expect in terms of that firearms legislation.

SB: Yeah, it's a really interesting one because without one of them it might be harder to meet the other one. But because you're trying to meet both at the same time, there's enough synergy between them that you're not really having to do anything additional on either side, really.

JK: Yeah, and I think that's quite interesting that one hasn't necessarily fed the other, but it makes sense, doesn't it, that you are recording objects and all their information associated with those objects for various different purposes. For us it's great because actually, as you say, there's nothing dramatically different that we need to do to meet the firearms legislation or the explosives site legislation or anything else, because we're already managing our collection in a way that meets our collections management museum best practice. Yeah, it's good that it's not all different.

SB: Yes. Speaking of collections management frameworks, how does accreditation work in relation to the weapons collections specifically? Are there any additional measures that you have to put in place to mitigate the risks that are involved obviously in keeping weapons? And how does this relate to the accreditation process more generally?

JK: The accreditation assessors have never asked us for anything additional. The National Security Adviser will ask us for something additional. I want to say it doesn't matter because that's not the case. They aren't necessarily interested in the collection type, in that they will make sure for accreditation that you're meeting what legislation is governing the collection type. But they're not asking – and they wouldn't necessarily know because they're not subject specialists – for anything additional, actually, in terms of that accreditation purpose. Just because we hold firearms, there's nothing additional detailed within there.

SB: But are there any areas where the general requirements for accreditation, because the Armouries holds weapons collections, are there any areas where you are seen to need more

stringent processes? Or is that, again, this is something that's already you're already doing and you're already meeting, when you're meeting the legislation?

JK: Yeah, there's that, and also because we are a national [museum]. So there's additional criteria if you are a national museum over any other type of museum. There's a level of expectation within the accreditation standards that you will be meeting higher standards because you are a nationally funded museum, which is different from, you know, a local authority [museum] and/or an independent [museum]. So there's that. Yeah, there are additional standards for us to meet as a national museum. Because we are insured by HM Government, we do need to meet those security standards and environmental standards and all the rest of it. That's where the additional pressure comes, but that again is more to do with us being a national rather than the collection that we hold, interestingly. In a way, it doesn't matter. It's the same kind of thing that you would have to do if you were Tate, for example, that holds paintings. The standards that they meet in terms of national museum standards would be the same that we meet, and it doesn't necessarily reflect the collection type within that.

SB: Do you think it should?

JK: I don't. I think it would be difficult for the accreditation scheme to know everything about all collection types to then be able to assess us on it. They would have to have so many assessors and we are the national museum of arms and armour, so where are they going to go to get their expertise? It would have to come back to us because actually we are the people who know about arms and armour, and the firearms legislation and how it relates to museums. That's us or should be. The same, for example, if they had queries on natural history material, well you'd go to the Natural History Museum. It's that whole thing, you can't be the expert and the person who's being assessed.

SB: Yeah, that would be a conflict of interest.

JK: Yeah, and that's where it's quite difficult, I think, for them to do that. So there has to be a certain level of understanding that if we meet the current legislation in these areas, then that's enough. Yeah, it's hard because we would be looked at, as I think, for other museums who hold firearms collections. They come to us and ask our opinion around, are we meeting this, is this the right thing? That's where our role is, and at some point I guess somebody should be asking what

our expertise is and where the liability sits. If we've said to another organisation, we don't feel you're meeting the legislative standards or whatever, is there a comeback on us if we get that advice wrong and things like that? That's the other area that we would need to be confident with. At the moment we advise on best practice, it's never come up that any best practice that we've given is wrong and has not been challenged in a court of law, thank goodness.

SB: Yes. The only third party really that could perform that role is the National Security Adviser, who you've mentioned. How does that process work as a part of accreditation and what consequences does this have for the firearms and other weapons collections?

JK: Well, interestingly, the National Firearms Adviser does not advise on accreditation. So the Scheme, it's all run by Arts Council England, and the Scheme has its own independent security advisers who will look at your facilities and all your security arrangements through the Accreditation Scheme and they are a separate entity or entities, I don't know who they are. But they are not the National Security Adviser and his team of consultants.

SB: Right, that's interesting. I assumed they were one and the same from reading it.

JK: Well so did I, because I had assumed if when a museum is accredited, they've met a certain standard of facility security because that's what's detailed within the Scheme. I definitely had made an assumption that it was almost a shorthand of, oh well, I don't need to necessarily check any of that because they will have met a certain level because they're an accredited museum. That has been, I think, everybody's assumption. I checked, I was checking this sort of thinking with the National Security Adviser, who said he doesn't check those applications. So there is a disconnect between the National Security Adviser and Accreditation it turns out, which is a potential issue because the standards and the facilities that they're looking at will be assessed in a different way I'm sure, because it's not being assessed by the same team and the same criteria. We've raised that as an issue, and I don't know where that's gone because we left it with the National Security Adviser in order to have that conversation internally within Arts Council England. I had made, and I'm sure a number of colleagues, we'd all made that assumption, that of course it must be being assessed by the same entity. And no, it isn't.

SB: Right. Well that makes security a bit more complicated, because I know as a national museum you are examined by the Security Adviser periodically. So that seems to be a bit of a disassociation there. That's quite interesting.

JK: Yeah, that what's interesting is it is detailed within the Accreditation Scheme whether you have had a visit from the National Security Adviser in the last five years and it's expected that he would visit within a five-year rolling programme. Or you would have advice from other security sources like police or in-house or other external specialists. There's a question around have you enacted all of his recommendations? That's why I think we'd all assumed that he must be assessing those forms. No. I know that ACE [Arts Council England] have been talking about how they join all of that up, because when you submit the Government Indemnity application in terms of that Scheme, the security aspects of that are definitely looked at by National Security Adviser. The environmental details are looked at in terms of their set of environmental consultants. There's a difficulty of trying to have transparency around who's looking at all that information. I don't know whether those environmental consultants in that sense are the same, or different to the accreditation ones. Again, there's a lack of clarity, and I guess partly because none of us have ever asked around who's looking at all of this information, where all that information goes, what the expertise of those individuals that are looking at that information is, and therefore what standard are we working to and what quality assurance do we have in terms of all of those schemes? Because, as I say, [we've] found that there's a bit of a disconnect between the two, which I think will only get harder as William [Brown, the former National Security Adviser] has announced that he's retiring soon, after 16 years of being in that role.

SB: That's going to be an interesting one, a new relationship to forge between the Armouries and the new Adviser.

JK: Yeah, I've only known, since I've been in the sector, I think two National Security Advisers, because they usually stay for a long period of time. As you say, you build up those relationships, and you can have a conversation and a lot of it is a pragmatic conversation around some of the stuff. I know we've talked about this before, in that if you look at what the detail of how you should display firearms collections, it's very clear within the Government Indemnity Scheme that, actually, you need to cable all your firearms to cases. Now, and you know that we don't do any of that in our venues, especially not in Leeds, where we have huge amount of firearms on

display, and that's always been offset by the [fact] that we have 24/7 security on-site, and they have a certain level of training. The way that the building is constructed is that, actually, the National Security Adviser is happy with that in terms of that risk mitigation. It's not the same for other venues, and that's where this becomes almost a double standard, but it's around this risk mitigation. So you go to the National Army Museum and you'll see that all their weapons are secured with a cable to the cases as an additional security measure.

SB: Yes, I believe it's the same at Imperial War Museum as well.

JK: Yes, and that's where it's quite interesting, isn't it? They're the same kind of entity, they're a national museum that holds a firearms collection and we, they and us, have a different display mechanism and that's interesting. I think it is going to be interesting how we... Because he [the National Security Adviser] has an in-depth knowledge of the history of the venues, so he can build up that. Yeah, it is going to be a challenging thing to do for a new person.

SB: Do you think that it will have an impact on the management of the Armouries' weapons collections? Or is it just difficult to tell at this point?

JK: I mean it depends who gets the job and what their background is, and everything else, and what their driver is going to be. But any change in personnel is always going to be different. The way that we deal with stuff and they approach things is going to be different. With William, it's often been a negotiation between the two. He makes a recommendation, and we can take it or ignore it I guess, but we would always try and take it. Whereas somebody else might be a bit more dogmatic about it and very much more prescriptive. Not act in a risk-managed way, but more like I'm following the rules, and these are the rules and you're not following them. So I think it will be really interesting which way it goes, and who gets it, and what we do next.

SB: I suppose an additional thing to think about is that some of the rules aren't actually rules, they're just advice and recommendations. Because I think the cabling firearms is in the Firearms Security Handbook, which obviously isn't law, it's advice. So there's that tension there.

JK: Yeah, you're right and it's what do you mean by best practice? Some of his advice can look like it's counterproductive and counter- some of his other advice, it's not always the same.

That's also interesting. It's not always easy because you can't second guess exactly what he's going to say. But you're right, I think some of it is not very clear as to is it written into the

legislation, and which legislation is it written into? Is it best practice guidance and where is that coming from? Yeah, things like the Firearm Security Handbook, it's whether we need to be taking more ownership of that and making sure that we are dictating the museum section to create best practice. And then, are we doing what is in there? If we're saying this is best practice, is what we're doing best practice or is what we're saying best practice? Not always the same, is it? Whatever that phrase is.

SB: Do as I say, not what I do.

JK: That's it.

SB: I suppose there's so many issues to think about, so many pieces of guidance, and so many different players involved, but it's just trying to find a balance. I think the thing that's come through from what we've been saying today is that it's all just one big grey area, and it's trying to negotiate with all the different players a satisfactory response, and that might change.

JK: Yeah, I think that's absolutely right. I think the difficulty is, as we've discussed before, is legislation isn't perfect, it never is. Often for various reasons the law doesn't work in practice, partly because it might have been a knee-jerk reaction and they just wanted to get it through. That, actually, for the day-to-day actions or businesses of what we should be doing, it's kind of counterintuitive. We're saying as a museum that we need to make our objects accessible, open, that we need to be showing them to the public, and then at the same time, we've got legislation that says, no, you're not allowed to. There's two pieces of legislation that say exactly opposite things for us to deal with our objects, and that's what's really hard. We've got to work on a best-case, risk-managed mechanism of doing things, and it's absolutely fine, until it goes wrong. Until we're challenged either in the law or somewhere else, that's when the problems will come. That's when you not following this piece of guidance, that recommendation, that's when it's going to come back and bite us, and then the possibilities and the thoughts around that. If we had an issue, and if there was a major incident, we might have our licences removed, revoked, and then what would happen in that instance if we did not have a Museum Firearms Licence, or if we had to give up our registered firearms dealers licence? That removes a huge part of our collection, that removes what we could do with that collection. So that's why, in a way, we have to meet with these. But it's this counter-intuitiveness of we want to make things open and accessible, and they are national assets for the nation to enjoy, and yet they're dangerous things

that we need to control, and keep away, and be secure. So it's always this balancing act of what we do and will continue to be so.

SB: Yeah, it's working within the constraints you have, but making sure that you're treading that fine line and you're doing everything you can for the access, but also everything you can to mitigate the risk involved in that. It's a very interesting one.

JK: But that's why collections management changes and evolves over time, and that's why we are constantly reviewing things. We took the opportunity during lockdown, Katie [Robson, Registrar at the Armouries] and I, to review the collections security process. We'd revised it and revised it and revised it, and then you suddenly start thinking, actually, this isn't fit for purpose. What are we trying to do again, and who's allowed where and what? So then we took the opportunity of just going back to complete basics. Okay, what are we trying to do here? It used to be called Red Zone, what does that mean? Nobody knew what it meant, I understand in a way where that's coming from, but to call a procedure the 'Red Zone Procedure', what does that mean? Then it's like, what are we trying to do here? Well, we're trying to control the security of the collection. Okay, let's call it that. What are we trying to do, who are we writing this for, and how are we trying to explain all of this? Really trying to go back to [basics]. Okay, that might have worked in the past, but what is working for us now? What do we need to do in terms of that? Yeah, legislation, tick, licences, yes, best practice guidelines. Then how are we going to implement that and how is it going to work for us as an institution? Which is why we've come up with a model, and that then we implement. Then we've been constantly tweaking it when people go, oh yeah, but when I've got this person and this number of people, and they're doing this activity, how does that work? And we go, well that doesn't work, so how do we do that? Let's document our thinking around that. It's that whole backing up. In a way, a lot of this is just documenting the thought processes, the decision-making process, it's that whole risk management again of those collections. I think that's been a really useful process because hopefully it's now made it simpler, that hopefully everybody understands what their responsibility and role is within that, and why it's important. That's the other thing. So there was always like this, oh well, you're not allowed in this space. Now is that because physically people were not allowed in that space? Is there a good reason for that, or do we just not like you as a person? It wasn't transparent, the process. It was like, oh well, that department never gets access

because that's that department. Whereas actually, there's a good reason for that, because they don't need that access. We're also trying to protect staff and individuals. Obviously, the other thing that we have to consider, and I think this comes to the fore as well, both in terms of the firearms legislation, but generally is around mental health as well. Actually having access to dangerous collections in whatever sense, is making sure that you are protecting the staff from the object, but also other staff from other staff. There's a lot of that as well that we need to consider, so sometimes going back to basics and reviewing your collections management, in light of having read legislation again and best practice, is a really good thing to do. I think, especially in terms of some of these more challenging collections, as I think you can refer to them.

SB: Yes, it's the idea of risk again, isn't it? It's the collections that pose the most risk. Just as part of that process of revisiting policy and procedure, has PAS [197] played much of a role in that? Because obviously that's providing the framework for all these collections policies and procedures. How does developing something like the collections security, how does that play out within the PAS framework?

JK: Yeah, those PAS frameworks are quite interesting because they're now publicly accessible, at a cost, and at quite a significant cost. This is the rub. They are advice. They are not, as in the BSI [British Standards Institution] standards, they are the stuff that comes out of BSI. They're not standards, they are advice, which is why we're currently working – so I'm a British Standards Institute expert sitting on all the collections management committees. There is a move currently underway to convert those PAS 197 and [PAS] 198 [*Specification for Managing Environmental Conditions for Cultural Collections*] into not only a UK standard, but a European standard as part of the CEN [European Committee for Standardisation] scheme. Both those two standards have been taken because they basically came out of date, so they're not currently in date. They're in the process of being converted into a European-wide standard and, although we have exited from Europe, we are still part of that European standard scheme and those British Standard Institute standards, and I think that will make it. I think the problem with PAS 197 and 198, whilst they were taken up to a certain level in the sector, they weren't standards, and that's the problem. So when you say to your governing body we're working to this PAS specification, they'd say, well that's not a standard, so why would we need to worry about that? Whereas now, I think that if we can convert it and we are converting them to a standard, a European standard,

it's very clear. It also means that others outside the sector, who don't have anything to do with collections management but understand the principle of, if you don't meet this building standard or a standard in whatever field, you're not meeting the standards. I think that's really important, and I think that's where the PAS were great. But actually, I think the world has moved on. That understanding of that and meeting a standard across European nations internationally would be really good, so that we're all talking the same language, that actually we're all, when we're moving stuff around, lending stuff, actually we are talking in the same terms. Because even if we're all speaking English, actually, things massively get lost in translation, and we can't afford for that to happen, especially when you're actually dealing with firearms as well. I means that's the other key thing around that.

SB: That's a really interesting insight. I didn't realise that you were involved with developing those. I've been looking at PAS [197] specifically over the last week or so, and it's interesting to see the references to the other literature are quite out of date now. You've got old versions of accreditation, old versions of the Indemnity Scheme, all that sort of thing. It would be very useful to have an updated one. It took me an absolute age to find a copy of PAS, I had to get the Armouries Library to order one, so it's interesting. But I think something that Laura [Bell, Director of Collections] said to me was that some of its principles and the overarching structure were incorporated into accreditation.

JK: Yeah, that's what they were trying to do. When the Accreditation Scheme was up for review and renewal, there was a big push by NMDC at the time, so National Museum Directors' Council, to actually name the standards within the accreditation. I think they're alluded to, I can't remember the latest accreditation, but there's no direct reference. We were saying what would be really useful for all of us is that understanding. At the moment, if we said to a number of our trustees about museum accreditation, they would go, yeah okay, why do you need to meet that? Again, if we had a standard in collections management and all the other cultural functions that museums carry out, if there were standards related to that, then we would need to meet them, and it would be really clear to everybody. It's this difficulty within the museum sector. I always describe accreditation as a bit like Ofsted, because most people understand what Ofsted is, because most people have been in school at some point in their life and know what Ofsted is. It's in common parlance, isn't it, in terms of everybody understands that. Whereas accreditation's

like, what's that then? So if you say it's our equivalent of Ofsted and then it's like, oh okay, I understand a bit more. But again, if accreditation referred to standards within that, I think then it would be this bigger understanding outside the sector. I think we've been really good at being really sector-specific and almost navel gazing and going, well we're all doing the same thing. But we're not looking outward and we're not being around that bigger sector stuff. So that's the difficulty sometimes, especially with legislation that's not specific to museums, is that you go to the Home Office and say, well I need to talk to you about Museum Firearms Licences. I don't know how many Firearms Licences there are in the UK, there are a lot, and museums are a tiny portion of that, and we're not all doing the same things. So for us to go and say, actually this doesn't work for us, well we're just tiny and nobody cares, and it's not a massive commercial impact. So it's not like the British Association of Shooting and Conservation beast that's going to the Home Office and going this legislation doesn't work for us. All our members are very important people, and I think their president is the Duke of Westminster, they're really powerful, influential people. Then there's this little bunch of museum people like, hello, we'd like to do this now, and they're like, err okay. It's hard when it's not completely us, and that's not just around firearms. It's also around, the same kind of discussions around human remains. Legislation is written from modern human remains, of course it is, but what if you don't know how old your human remains are and you need to prove it's less than a hundred? Over a hundred years old and then you're okay. Well we can't do that. Do we need a licence, do we not need a licence? Then you know that you're breaking legislation, but they're not going to come after you because you're so tiny and nobody cares. But that's not right. It's like eggs. Eggs are a special case in museum collections. Museums are breaking the law by holding egg collections, mostly, because the way the legislation's written. In practice, the police are not going to charge museum collections, unless you're going out and actively taking osprey eggs. But it's illegal. It's this weird balance of we're not meeting legislation, we're not being legal because we can't be.

SB: Yeah, you're between a rock and a hard place, right? That you get rid of the collections or you hold them technically illegally, but whether it should be or not is a different matter.

JK: Because there were no exemptions made. Because at the time, we're not a big enough entity, that we can say actually we need an exemption. Sometimes we are but sometimes we're not, and it was lucky that we've got a Museum Firearms Licence that gives us scope to do lots of things.

What it doesn't do, it's not detailed enough as to what actually does that mean. Does it mean that we can use weapons, demonstrate them, on our site, off our site? Actually, it's not very clear.

SB: Even the security arrangements it says it's up to the police, basically, and then you get into the whole thing of how do you interpret this and what's the right security level?

JK: It's fine [if] you're one entity working in one area. So Leeds Museums and Galleries, they operate under West Yorkshire Police in West Yorkshire because they're all in Leeds. It's a small area, it's a small force. For us, we have been writing policy and procedure for the organisation, because we're an organisation, but we're operating under three police authorities. So West Yorkshire, the Met, and Hampshire, they don't see eye to eye, I can tell you. We're trying to make it so that it's best practice across the organisation, but actually, in terms of how each police force deal with us on a day-to-day, individual basis can be quite different. Sometimes it isn't, but sometimes it is, and it's which one do we take more notice of? It hasn't come to a point where they disagreed, I'm not saying that, but it's just there isn't clarity because the way that the legislation is written, again, is that the Home Office basically details it down to each individual police force. They then, because it's not clear, interpret it as to how they see it working. Yeah, it's so interesting that we negotiate in the middle.

SB: Yeah, if there was a dispute, you'd have to put them in touch with each other, and they could argue it out and you do whatever the result is.

JK: Yeah, that doesn't go for good building of relationships thing, does it? Let's set the police forces against each other.

SB: No, collaboration and discussion rather than an argument. Going back to the idea of putting everyone on the same page, I think it'll be a good time to discuss the Government Indemnity Scheme. Does it impose any further constraints on weapons collections? Or is it something that's again, very much a broad thing, you may have to introduce extra things, but that's more primarily legislative in nature?

JK: Yeah. Again, they don't mention [weapons]. It's done on a more of a risk-managed basis these days: the National Security Adviser will look at the venue, or look at what the objects are, will look at the risks associated with those objects, but also in terms of values. There are different constraints depending on whether it's multi-million-pound thing versus a thousand

pounds' worth of thing, which is hard because they're all national assets, and in theory everything should be dealt with in the same way. But in practice, we all know that actually that's the monetary value, and therefore what the liability level that the Treasury might have to pick up if there is a total loss or damage to those items. That's what's driving it. Without the Government Indemnity Scheme, we and lots of museums couldn't do what we do, we could not afford to insure our collection in the way that it is. Other venues couldn't afford to borrow material from the national collection without that Scheme, because the onuses would be too high on them. Even then, because of the constraints that the Government Indemnity Scheme put on people, is actually sometimes museums cannot meet those standards for whatever reason, and therefore they will look to commercially insure works. That's hard as well, but that's the cost-benefit analysis, is either you're meeting the very stringent requirements that Government Indemnity sets out, for good reason, so that we've mitigated those risks, or you've paid for insurance. Again, it's that balancing act of what are the pros and cons. I think the biggest difficulty that GI [Government Indemnity] places on non-national collections is the length of time that they ask for applications to be in. So for us, we can borrow things within like three days in terms of the application process. For Leeds Museums, for example, for local authorities or any other non-national, it says you need to apply for three months in advance, if not longer with every single detail, and at that point you don't necessarily have all that detail. So that often is a barrier. It's less meeting the requirements and more actually the application length of process. Yeah, it's an interesting scheme, but it is the best that I've come across. It's probably the best in the world in terms of that government underwriting. There is a complete understanding that given the government and we're all paying for it anyway, that there is a limit of how much liability the government is prepared to take. The Treasury is constantly looking to reduce that level of liability, for good reason, because it's all taxpayers' money and that's what we have to remember at the end of the day. So there is a pressure that the whole scheme is tighter because of that. They're under pressure to be more stringent and risk averse because then they know that they're not going to get any claims, and therefore the Treasury isn't going to have to pay up.

SB: Again, it's the idea of synergy, the mitigation of risk is obviously useful from a financial perspective, but it's also useful from a security perspective. Do you think that the indemnity constraints, as they are now, are strong enough for weapons collections generally?

JK: Yeah, I do. I think what will be interesting as we look at a more sustainable [future] in terms of environmental stuff, especially in museums. I think those standards are going to have to widen, at least those very narrow environmental parameters that are set out within the Scheme and set out within, actually, most loan procedures. I think we are going to have to shift as we move towards more sustainable, in terms of environment, ways of doing things. But I think that the problem with weapons collections is always the security aspects, we are going to have to keep those. Other museums not having a suitable case is a really key thing for us, especially in terms of locks standards, in terms of glass standards, because that is the first line of our defence really, and we've all seen those museum break-ins where they've smashed cases and even when they're quite thick laminate glass. But we just can't afford for that to happen, both in terms of the actual assets themselves, but in terms of reputational damage as well. That's another key thing to think about in terms of that risk management is what happens if you do have an instance, if we do have a theft, if we do have a loss. The perception, especially public perception, of if it's a firearm, that's even worse in that it could be used. A lot of our firearms are not useful in that sense, in terms of criminal activity, but it doesn't make any difference. It's a shotgun, it's a gun.

SB: You can see the headlines.

JK: Yeah, of course you can, and that's what's hard. Or it's a sword, people can do a lot more damage physically immediately with the sword than they can with a firearm, especially as we don't have ammunition next to firearms, those are very separate and controlled in separate manners. So I think the current scheme works really well, and I think the levels of security mean that we're all assured that if it meets that standard, it's really good. It's a tough, but it's a good standard, and we're all assured by that.

SB: Thank you, that's really useful, just seeing the insight of how it actually works. I think to finish off now, I've got one broader question. How do you think that the regulation of weapons collections in museums can be better served? Do you think there should be some form of guidance that brings the legislation and the more collections management-based aspects together? If so, how do you think that would work?

JK: Yeah, it's something that's on my list, because I think it would be really useful. The Firearm Security Handbook that you mentioned, that's good to a certain extent, it focuses on security. What we have been talking about doing, and I know that Laura is very passionate about doing

this, is creating a museums firearms handbook, a one-stop book, entity, website, I don't know what kind of resource it would be. A one stop shop of, if you have any queries in a museum context around firearms, whether it be legislative, conservation, documentation, or how to use them, innovative programmes around that use. Anything to do with firearms, there should be a thing, let's call it a book, that you can refer to. We, as the national museum, should be doing that, and so we have got this plan in our heads of how we might facilitate that. We've started some of that work, the conservation team have done some really great stuff in terms of, this is how this kind of lock mechanism works, this is how you would treat this gun, and some of that's come around from our particular training. But I think all of that, if we could bring all of that together, it would be an amazing resource for everyone, and it's something that we need to look to do and deliver, I would hope. I know that Laura has been talking about doing this and writing this for some time, and I think we need to get on with it. But I think that would be a great idea, and I think as the national museum, we should be doing that, that's our role and it's great. We've got all that expertise and it's all in our heads, but we need to pull it all together and have it as a central point of reference for everyone.

SB: What form should it take? Should it be more guidance or is there any way of enforcing it more stringently?

JK: If we're writing it, I think it can only ever be guidance. Guidance in the strongest terms in a way, but guidance in that sense that I don't know who would legislate in that sense around it. It can only be guidance in drawing together so many different strands of legislation and other best practice. I think it would have to just be a guidance tome, but it would be *the* handbook on [firearms] that hopefully everyone would then refer to and be the museum firearms bible as it were. I think that would be good.

SB: Do you think that any of the other organisations we've mentioned should be involved like the Home Office, or maybe one of some of the more museum focused ones like the Museum Association or Collections Trust, or anyone like that?

JK: We could write it, and then we would get other people's opinions on or their take on [it], and make sure that we were... Yeah, it's like a peer reference group. It would make sense that all of those organisations had an input, an editorial role in a way. But I think, again, the knowledge base sits within us and within the national museum. I think that's where we need to be, that's

where I hope the expertise is sat in-house. Then you could get the Home Office to check the legislative requirements, to make sure that we weren't saying things that we shouldn't, all of those kind of things. I think there's a broader consultative role around how you might do this, how you might almost publicise it and share it as well. So you would hope that if somebody's going to apply for a Museum Firearms Licence to the Home Office, they would say, absolutely, and have you seen this piece of guidance? Because this will tell you everything you need to know. It's that kind of thing, again, with the Accreditation Scheme, you hope that anyone with a Museum Firearms Licence, who holds firearms or arms and armour collections might be pushed towards that tome. So it has to be collaborative, and I think that's the difficulty. Trying to get anything written collaboratively, and by committee, is always the challenge.

SB: That's where you writing it and then getting other people to check it probably will expedite the process a bit, rather than having everyone involved right from the start.

JK: Yeah. Learning from my standards work, European standards usually take at least three years, if not five years, to generate. It is absolutely a compromise, because you have to take into consideration the 32 countries that are in CEN. You will never please everyone. There will always be some people who would just go no, no matter how reasonable or collaborative you try and be. Yeah, it's a very interesting process. But writing stuff by committee is always really hard, and what's been quite nice with the group that's looking at the conversion of the PAS 197-198 to a European standard is that we have something already, we're not starting from scratch. So we did take the two PAS formats, we did combine them, and then basically it's great because it's always easier to tear something apart that you've already got written and critique that, and go, we definitely don't want it like that. Rather than thinking in an esoteric matter of what should this contain, and having those conversations, because I've also been involved in standards where that's happened. That's been really hard because it's just like we need to be talking about transport and packing, not about all of this, in this context. So it's been quite useful to have those PAS 197-198 to go, that was good then but actually. When you start to read it again in a very critical manner, you realise just how flawed it was. Yet, at the time we were like, this is great, because that's all we had. Now we've tried to change the language in it to be more active. The current PAS are very passive in terms of their language, and we've tried to turn it round and

make it a doing practical guide, practical standard, not a beating-you-over-the-head standard, hopefully. That as well.

SB: Well, I hope it's useful. The last thing I'd like to mention is that the guidance that's being thought of at the moment at the Armouries is concentrating on firearms. Do you think there would be a place for other weapons collections, so mainly edged weapons and explosives?

JK: Yeah, I think so. I mean firearms is such a big topic, but it's also quite constrained and I think that's a good model to start with. Explosives again, could be a relatively easy win. I think when we get a new Curator of Artillery and we've worked through some of our explosives issues, I think the management of those explosives collections is relatively straightforward in terms of the management of large artillery shells, more ammunition, and then small arms ammunition. I think that we can manage quite carefully, and we could produce something quite quickly on that. Firing of historic pieces, is a whole other game, which again, we absolutely have the expertise in, but that's a whole other thing, and it's something that we're starting to work internationally about because we've got colleagues in Canada. Parks Canada have been firing historic pieces for a long time and have a very similar legislative framework to us that we can work with. Because that's so niche terms of firing historic pieces, I think working internationally on that is a would be a useful thing. With edged weapons, I think it's also drawing a line of where we start and stop with edged weapons, and what is an edged weapon. Whilst we have a very clear idea from an arms and armour perspective about edged weapons, I think that could be quite enormous depending on what other collections you look at. So I think that one's slightly more complex, potentially.

SB: But it's less complex legislatively, at least in the museum context, so you've got the balance there.

JK: Yeah, you're right. There's a perception in museums that swords are less complicated. Partly I think you're right, it's to do with legislation, less complex to deal with, and have always been around, and a lot of places, historic houses have them hanging on their walls and things. Whereas, again, firearms and especially the more modern firearms, are always seen as problematic. Yeah, I think that's absolutely something that we need to find time for in terms of starting to pull all of that together. It needs a concerted effort, but it's something that we should be doing as the national museum.

SB: Obviously happy to contribute where I can, given that this is what I'm linked to.

JK: Yeah, it makes sense. Hopefully you've had the same kind of answers from Laura and Katie as well.

SB: Yes, it's been quite similar across the board. But I think that's everything I wanted to speak about today. Is there anything you'd like to add right at the end?

JK: No, I think you've covered everything. I just think it's all really interesting and it's really useful for us to think about these things as well, have that time and have the questions from you in terms of questioning our practice, I think is really useful and beneficial. I hope it's working both ways, so you're getting out what you need to from our questions for your PhD. Then for us also to question our practice, I think it's really helpful.

SB: Well, I'm definitely getting loads from it, so I'm happy that you're also getting something out as well. In that case, I shall end the recording.