

**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.**

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For Granny,  
Her irrepressible intellectual curiosity was an  
inspiration to all who knew her.

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## **Abstract**

Museums today are expected to proactively share their collections with external audiences, but what if this access is constrained by stringent physical restrictions enshrined in law? This thesis draws on the example of the Royal Armouries, the national museum of arms and armour, to work through the challenges of facilitating access to its restricted weapons collections. As the personnel primarily responsible for overseeing this process, museum registrars are central to this investigation.

By responding to museological debates around the major themes of regulation, ethics, and access, this research navigates the intersecting practical and theoretical contexts in which registrars operate. Carefully selected case studies provide departure points to explore the complex role of the Royal Armouries' registrar staff in coordinating the management and use of its weapons collections. The two overarching principles guiding this research – critical museology and assemblage theory – play an important role in drawing together the various dimensions of their operational activity. Interviews with the Royal Armouries' registrar team ground this analysis in the daily realities of collections stewardship and enrich the case studies with their expertise.

Harnessing the procedural focus of assemblage theory, this study clarifies the interconnected processes supporting access to restricted museum objects. Without the strenuous efforts of its registrar staff to reconcile the seemingly incompatible demands of regulation and external engagement, the Royal Armouries would struggle to discharge its responsibilities as a public museum. Following the principles of critical collections management, this thesis concludes by anticipating future developments in weapons management and the registrar profession as a whole. This critical investigation of the Royal Armouries' routine operations thus represents an important original contribution to museum studies. Registrars are a key pillar of contemporary museum programming – this thesis therefore seeks to draw greater attention to their work.

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## Abbreviations

ACE	Arts Council England
BS 17820	BS EN 17820:2023 Conservation of Cultural Heritage: Specifications for the Management of Moveable Cultural Heritage Collections
BSI	British Standards Institution
CDA	Collaborative Doctoral Award
DCMS	Department of Culture, Media & Sport
FLC	Firearms Licensing Certification
GIS	Government Indemnity Scheme
HSE	Health and Safety Executive
ICOM	International Council of Museums
ICOMAM	International Committee on Museums of Arms and Military History
IWM	Imperial War Museum
MA	Museums Association
MAS	Museum Accreditation Scheme
MSPA	Manager, Security and Protection Advice
MWG	Museum Weapons Group
NFC	National Firearms Centre
NSA	National Security Adviser
PAS 197	PAS 197:2009 Code of Practice for Cultural Collections Management
UKRG	UK Registrars Group
WiS	Weapons in Society
WYVRU	West Yorkshire Violence Reduction Unit



## Introduction

The title of this thesis addresses a range of complex and challenging themes – ethics, policy frameworks, governance, access, collections management, legal restrictions, and arms and armour museums. While these subjects may appear to be unrelated at first sight, they nonetheless converge in the position of the museum registrar. This project was formulated to articulate their essential contribution to the museum sector. As a Collaborative Doctoral Award undertaken with the Royal Armouries (hereafter, the Armouries), this work seeks to present a comprehensive assessment of the registrar's role that benefits both professional practice and museological study. The basis of this collaborative research has been the three key questions posed by the supervisory team in the Award's original brief that addressed the workings, challenges, and purposes of collections management at the Armouries. Engaging with these priorities has profoundly shaped the direction of this thesis:

What are the ethical and legal dimensions that inform the management of and access to collections of arms and armour?

The first question lays the groundwork for the project, establishing that daily practice at the Armouries and its drivers comprise the main substance of this research. It has played an important role in shaping the investigative approaches that guide the study. The three major themes that structure this evaluation of collections management at the Armouries – regulation, ethics, and access – are all significant components of this first question. By closely studying routine collections work at the Armouries, this study aims to convey the complex interplay of agents that informs its current operations.

When those collections have specific legislative challenges to access how does the Museum fulfil its public role and maintain its legal duties?

The second question builds on the functional orientation of the first by considering the Armouries' collections management strategies in light of its broader responsibilities. It captures the tension inherent in its status as a national museum – how to reconcile the competing claims of regulation and public access. This operational balancing act originates in the document that officially established it as a national museum, the *National Heritage Act 1983*. According to this legislation, the Armouries must 'care for, preserve and add to the objects in their collection of arms, armour and associated

objects’, whilst simultaneously ‘secure that the objects are exhibited to the public’.<sup>1</sup> The friction between these two discordant purposes is a central theme of this research, as it generates many of the pressing dilemmas faced by the Armouries’ registrar staff. This tension is especially apparent in relation to its weapons collections, which are subject to stringent legal regulation, so it constitutes an encompassing theme of this thesis.

When many see the key role for national museums as public access and education, given the way they are exchequer-funded, how do we justify housing collections that are very challenging to enable access to?

The third question is less concerned with the daily operations of the Armouries, unlike the previous two, and more with its very existence as a public museum. Discussion of its fundamental rationale is largely absent from the main body of this thesis, as it seems more constructive to prioritise the examination of weapons management in museums when very few critical assessments of the practice currently exist.<sup>2</sup> However, the existential issues prompted by this question do feed into this work’s conclusion. After all, the implementation of an effective collections management strategy helps the Armouries to justify its ongoing receipt of taxpayer funding as a national museum.<sup>3</sup>

The overall objective of this study is to produce an authoritative account of the complex nexus of procedures, principles, actions, and decisions that constitute registrar practice at the Armouries. To fully realise its potential value, this purpose must be embedded in the fabric of the research. The management and use of the Armouries’ weapons collections are therefore considered from three distinct but complementary perspectives. These are codified in a revised set of research questions:

What are the regulatory frameworks that govern access to museum weapons collections, and how have their shifting parameters shaped the institutional obligations of the Royal Armouries?

How do ethical principles inform the approach of the Royal Armouries’ registrar staff to the challenges of managing its weapons collections in a responsible and viable way?

What policies and procedures do the registrar staff at the Royal Armouries implement to facilitate meaningful access to its weapons collections, and how can these be refined going forward?

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<sup>1</sup> *National Heritage Act 1983*, c. 47 (London: HMSO), p. 11.

<sup>2</sup> Rachel Adams, ‘Military Collections’, in *The Curation and Care of Museum Collections*, ed. by Bruce A. Campbell and Christian Baars (Abingdon: Routledge, 2019), pp. 100-19.

<sup>3</sup> In the 2021-22 financial year, government grant-in-aid funding accounted for £9.7 million of its total income of £12.3 million (78.9%). See, Board of Trustees of the Royal Armouries, *Annual Report and Accounts for the Year Ended 31 March 2022* (London: The Stationery Office, 2022), p. 60.

By seeking answers to these questions – strategically structured around the themes of regulation, ethics, and access – this research seeks to clarify the intersecting practical and theoretical contexts in which registrars operate. Through a critical investigation of weapons management at the Armouries, this study offers recommendations for its future development across the museum sector. Without the strenuous efforts of its registrar staff to reconcile the competing claims of regulation and public engagement, it would be incredibly difficult for the Armouries to discharge its duties as a national museum. Registrars are integral to contemporary museum operations, so this thesis seeks to draw greater attention to their work.

### **The Subject: Registrars and Their Practice**

In order to conduct an effective investigation into weapons management at the Armouries, it is first necessary to understand the general situation of museum registrars. Their emergence as a key force within the museum profession is a relatively recent development. While registrars were present in certain US institutions as early as the late nineteenth century, it was from the 1960s and 1970s that museums frequently began to employ them in response to the formulation of more rigorous standards of collections stewardship.<sup>4</sup> What began as a North American phenomenon then spread to Europe, as practitioners and institutions there sought to emulate this burgeoning professional conduct. It was in this context that registrars first emerged in Britain – at the National Gallery (1977), the National Portrait Gallery (1978), and Tate (1979) – drawing heavily on models of the role pioneered in the US.<sup>5</sup> In the intervening years, they have established themselves as an indispensable part of the museum workforce. Their main responsibility is the coordination of the sophisticated collections management processes and strategies that underpin modern museums.<sup>6</sup> It would be difficult for contemporary institutions to perform their expected functions – collections stewardship, exhibitions, loans, digital engagement, education programmes, community outreach – without these elaborate systems for the perpetuation of cultural heritage. But it is important to

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<sup>4</sup> John E. Simmons, 'A Very Brief History of the Profession', in *MRM6: Museum Registration Methods*, ed. by John E. Simmons and Toni M. Kiser, 6th edn (Lanham: Rowman & Littlefield, 2020), pp. 2-16 (pp. 3-5).

<sup>5</sup> Hélène Vassal and Sophie Daynes-Diallo, 'From Functions to Profession: The Emergence and Rise of Registrar Professions in Europe', *Museum International*, 68.1-2 (2016), 59-70 (pp. 61-62).

<sup>6</sup> John E. Simmons, 'Collection Care and Management: History, Theory, and Practice', in *The International Handbooks of Museum Studies*, ed. by Helen Rees Leahy and Sharon Macdonald, 4 vols (Chichester: John Wiley & Sons, 2015), II: *Museum Practice*, ed. by Conal McCarthy, pp. 221-48 (p. 224).

recognise that registrars do not perform this work alone, as the profession extends beyond those officially named as a registrar. At the time of writing, for example, the Armouries' registrar department contains a Registrar, two Assistant Registrars, a Documentation Officer, a Documentation Assistant, and a Registrar Trainee.<sup>7</sup> This proliferation of roles threatens to destabilise any coherent conception of registrar practice in spite of their institutional proximity. To circumvent this difficulty, the use of 'registrars' refers to the profession in general. In the context of the Armouries, this study instead employs 'registrar staff' or 'registrar team' to encompass its eponymous registrars, those under their charge, and, where appropriate, their collections department superiors. Yet even this expanded definition of the museum registrar still simplifies operational realities. The messiness of everyday practice means their jurisdiction overlaps with a range of other personnel: collections managers, curators, keepers, archivists, conservators, technicians, mount makers, computer specialists, consultants, directors, and volunteers.<sup>8</sup> These groups may not be registrars, but their respective contributions are not always mutually exclusive. The theme of institutional collaboration is thus central to the provision of access to the Armouries' weapons holdings. In this respect, the role of registrar staff in coordinating access to museum collections constitutes the primary (if not sole) subject of this investigation.

Now that a basic overview of museum registrars has been established, the next step is to explore the scope of their practice. One of their foremost responsibilities is embedded in the role's name. The original meaning of 'registrar' was a person responsible for registration – the creation and maintenance of records.<sup>9</sup> This linguistic connection reflects the enduring significance of documentation to the profession. The standard text for registrar practice is still entitled *Museum Registration Methods* after sixty years and six editions, with an entire section dedicated to records management.<sup>10</sup> Documentation (of both objects and processes) is undoubtedly a defining element of registrar practice. This emphasis of the museum's duty of responsible stewardship introduces another field closely associated with registrars: collections management. The

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<sup>7</sup> Royal Armouries, 'Collections Department Structure' (unpublished internal document, 2021).

<sup>8</sup> Rebecca A. Buck, 'Collection Roles', in *MRM5: Museum Registration Methods*, ed. by Rebecca A. Buck and Jean Allmore Gilmore, 5th edn (Washington, DC: American Association of Museums Press, 2010), pp. 12-13 (p. 12).

<sup>9</sup> Mary Case, 'What Registrars Do All Day', in *Registrars on Record: Essays on Museum Collections Management*, ed. by Mary Case (Washington, DC: Registrars Committee of the American Association of Museums, 1988), pp. 13-33 (pp. 18-19).

<sup>10</sup> *MRM6: Museum Registration Methods*, ed. by John E. Simmons and Toni M. Kiser, 6th edn (Lanham: Rowman & Littlefield, 2020), p. vi.

strong association they currently share is rooted in a common past. Collections management started to emerge as a distinct field of museum practice during the 1970s in response to the formulation of more rigorous benchmarks for the care of collections.<sup>11</sup> For the first time, it was widely recognised that the effective stewardship of museum collections required active coordination. The museum registrar was one of the specialist roles created to fulfil these new duties, whose occupants became numerous enough to form a distinct profession in due course.<sup>12</sup> It is understandable then that registrar practice overlaps closely with collections management. There is no shortage of definitions for the latter occupation, but one should serve to demonstrate its general scope. Collections management broadly encompasses the fields of inventory, information, preservation, movement, documentation, exhibitions, and access – in short, knowing ‘what you have and where to find it’.<sup>13</sup> Many of these functions are organised and implemented by registrars within a museum context (see Figure 1, below). This connection is further emphasised by the common interchangeability of the titles of registrar and collections manager.<sup>14</sup> Overall, the historical, practical, and etymological parallels are undeniable. In spite of this close affinity, however, it is important to recognise that registrar practice and collections management are not identical. There are aspects of collections management that are generally acknowledged to lie beyond the remit of registrars. Collections care and remedial conservation are both key elements of object preservation, for example, but these functions are chiefly performed by specialist conservators.<sup>15</sup> Collections management relies upon many different forms of expertise, beyond the capacity of any single role. While registrars thus deliver many strands of a coordinated collections management strategy, it is too expansive a term to encapsulate their specific contribution to museum operations. An alternative formulation is required.

If registrar practice is not entirely analogous to collections management, then it is important to establish its parameters for the purposes of this study. In the first place, it embraces the expanded notion of ‘registrars’ developed earlier in the section. Registrar practice is thus envisaged to be the practice that is undertaken by an institution’s

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<sup>11</sup> Marjorie E. Hoachlander, *Profile of a Museum Registrar: CASE Research Project 7-78* (Washington, DC: Academy for Educational Development, 1979), pp. 7-9.

<sup>12</sup> Vassal and Daynes-Diallo, p. 61.

<sup>13</sup> Freda Matassa, *Museum Collections Management: A Handbook* (London: Facet Publishing, 2011), p. 3.

<sup>14</sup> Steven Miller, *Museum Collection Ethics: Acquisition, Stewardship, and Interpretation* (Lanham: Rowman & Littlefield, 2020), p. 140.

<sup>15</sup> Helen Lindsay, 'Evidencing the Case for Preventive Conservation: The Role of Collections Care Documentation', *Studies in Conservation*, 63.S1 (2018), 175-80 (p. 176).

‘registrar staff’, whether this constitutes a single individual or an entire department. As for ‘practice’, this is framed as ‘what actually goes on in museum work’.<sup>16</sup> With respect to registrar practice, it is used to denote the museological processes that are carried out by registrars in the course of their routine duties. It represents the unique constellation of functions and responsibilities that characterises the recognisable sphere of registrar work. The scope of registrar practice used here does not extend to their administrative duties (such as personnel management or budgeting), however, as these tasks are not exclusively performed by registrars and thus do not distinguish their work from other museum roles. As such, they are better ascribed to an occupational notion of museum practice rather than registrar practice specifically. The overall rationale for adopting these parameters is to provide a core group of functions delivered by registrars as the basis for exploring the challenges involved in facilitating access to restricted collections. In pursuit of this fundamental objective, it is first necessary to establish an idea of the routine operations for which they are perceived to be responsible. Consequently, this thesis has adopted a composite interpretation of registrar practice that brings together its diverse facets.<sup>17</sup> This approach has harnessed various extant definitions – formulated by registrars themselves in most instances – in order to establish a general impression of their operational brief. The current scholarship around registrar practice has supplied the raw material for this endeavour. Strenuous efforts have thus been made to conduct an exhaustive search for expositions of their diverse remit, starting with the key texts in the field – such as *Museum Registration Methods* – and combing their bibliographies to source further definitions.<sup>18</sup> While the fragmented nature of the scholarship on museum registrars means that certain texts addressing their practice may have eluded notice, the systematic nature of this literature search has overall provided suitably comprehensive groundwork for the purposes of this thesis. The outcome of this exercise was a group of eleven distinct interpretations of modern registrar practice that are characterised by a variety of authors, approaches, and ambits.<sup>19</sup> Following this careful selection process, it has been possible to generate a comparable group of occupational definitions as a means of harmonising the varied conceptions of registrar practice.

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<sup>16</sup> Conal McCarthy, ‘Grounding Museum Studies: Introducing Practice’, in *The International Handbooks of Museum Studies*, ed. by Helen Rees Leahy and Sharon Macdonald, 4 vols (Chichester: John Wiley & Sons, 2015), II: *Museum Practice*, ed. by Conal McCarthy, pp. xxxv–lii (p. xxxv).

<sup>17</sup> Stuart Bowes, ‘The Museum Registrar as “Assembled Role”: A Productive Conceptualization of Collections Management Practice?’, *Museum and Society*, 21 (2023), 62–73 (pp. 67–68).

<sup>18</sup> *MRM6: Museum Registration Methods*.

<sup>19</sup> Bowes, pp. 63–64.



After establishing a cohesive body of informed perspectives on registrar practice, the next step was identifying shared areas of agreement between them in order to synthesise a single expression from its fragmented articulation. The overall aim has been to identify the most common duties ascribed to registrar work by its practitioners. The museological functions referenced by multiple commentators thus form the basis of the resulting interpretation of registrar practice, while those that only appear in isolated instances have been excluded (like object valuation). Where appropriate, variations in terminology have also been grouped under a single term to further streamline this data. Documentation, for example, encompasses references to its numerous synonyms of cataloguing, recording, record keeping, or registration.<sup>20</sup> Isolating the constituent elements of daily practice is a challenging task. These individual functions have then been assigned to larger thematic groupings that accord with professional thinking. The Registrar Committee of the American Association of Museums identified information management, logistics, and risk management as the three areas in which ‘registrars are usually specialists’ – an observation that remains just as salient today.<sup>21</sup> This premise is adopted here with one minor change, replacing ‘information management’ with ‘resource management’ to reflect the registrars’ responsibility for monitoring both objects and their associated information. This acts as a broad overview of the expansive operational remit of museum registrars without imposing too great a prescription. Having outlined the rationale behind this deconstruction of the decisive occupational contribution of museum registrars, the results of this analysis are reproduced below in Figure 1. At first glance, this reading of registrar practice encompasses a series of duties that might not seem superficially connected. There is no definitive reason, for example, why an individual responsible for accessioning objects should also coordinate the installation of exhibitions. Their attachment to the same role owes as much to historical accident as to any professional design.<sup>22</sup> The use of a composite interpretation thus accommodates the haphazard accumulation of responsibilities that has shaped the current scope of registrar practice. Ultimately, the Armouries would struggle to share any of its collections without the diligent implementation of these constituent functions.

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<sup>20</sup> Malcolm Chapman, 'Managing Collections or Managing Content?: The Evolution of Collections Management Systems', in *The International Handbooks of Museum Studies*, ed. by Helen Rees Leahy and Sharon Macdonald, 4 vols (Chichester: John Wiley & Sons, 2015), II: *Museum Practice*, ed. by Conal McCarthy, pp. 267-92 (pp. 268-69).

<sup>21</sup> Registrars Committee of the American Association of Museums, 'Code of Ethics for Registrars', *Museum News*, 63.3 (1985), 44-46 (p. 44).

<sup>22</sup> Buck, p. 12.

**Figure 1: Composite Interpretation of Registrar Practice**

Stuart Bowes, 'The Museum Registrar as "Assembled Role": A Productive Conceptualization of Collections Management Practice?', *Museum and Society*, 21 (2023), 62-73 (p. 68).

<b>Resource Management</b>	<b>Logistics</b>	<b>Risk Management</b>
Accessioning	Exhibition Installation	Collections Care
Deaccessioning	Storage	Condition Reporting
Documentation	Handling	Security
Inventory Control	Packing	Insurance
Loans Management	Internal Movement	Due Diligence
Rights Management	External Transport	Legal Compliance
Exhibition Management	Customs	Ethical Compliance

There are a number of reasons for this study to adopt this interpretation of registrar practice. Firstly, it approximates recent definitions produced by recognised authorities on the subject. It bears close resemblance to the role as recently conceived by the UK Registrars Group (UKRG), for example, a prominent professional body:

[Anyone] who has a responsibility for carrying out and/or documenting one or more of the following activities:

- Object entry, acquisition and disposal
- Loans management
- Collection care
- Object packing and logistics
- Exhibition installation
- Exhibition tour management
- Location control
- Indemnity and Insurance
- Interpretation and advice on legal and regulatory issues.<sup>23</sup>

Its contents differ from Figure 1 in only a few respects. The correspondence of the composite conception of registrar practice to prevailing professional thinking lends it a sense of authority deriving from first-hand experience of the field and ensures it remains grounded in the processes it seeks to encapsulate.<sup>24</sup> After all, maintaining practical relevance is a central objective of this study. It is also important that this interpretation fits the prevailing cultural landscape. The uncoordinated development of the registrar profession at an international level has caused national conceptions of their remit to diverge somewhat.<sup>25</sup> Although the interpretation set out in Figure 1 originally drew on US works, its resemblance to the UKRG definition enables it to be usefully adopted in a

<sup>23</sup> UK Registrars Group, *UK Registrars Group Constitution* (London: UK Registrars Group, 2019), p. 1.

<sup>24</sup> McCarthy, p. xli.

<sup>25</sup> Vassal and Daynes-Diallo, pp. 61-62.

British context as well. Its application to the Armouries' operational workings thus negotiates the subtle variations distinguishing international manifestations of the role. This conception of registrar practice also satisfies the requirements of the study on a more prosaic level. It provides a thorough overview of their work without becoming too unwieldy. More comprehensive articulations of registrar practice than the one adopted here have been published, but these can run to multiple pages – as in the case of the exhaustive list set out in the most recent edition of *Museum Registration Methods*.<sup>26</sup> Attempting to investigate the institutional performance of the myriad functions and duties contained therein would take this study beyond the parameters of a doctoral thesis. In a similar vein, this interpretation does not purport to represent an exhaustive account of every task a registrar may perform (the exclusion of their administrative duties has already been discussed). This has never been its purpose. The composition of the role is so malleable in reality that developing a conclusive definition of registrar practice is essentially a futile endeavour. The interpretation outlined in Figure 1 thus strikes a suitable balance between relevance and coherence. It is detailed enough to serve as a manageable working summary of the contribution of registrars to contemporary museum practice. It certainly suffices for the purpose of examining their role in the provision of access to the Armouries' restricted collections.

In pursuit of its conceptual objectives, this study emphasises the aspects of registrar work associated with the major themes embedded in the overarching research questions. Two of the subjects animating this thesis readily map onto the constituent functions of registrar practice outlined in Figure 1, namely the parallel duties of legal compliance and ethical compliance. These processes are both key facets of the registrar's responsibility for risk management and are especially significant in the context of restricted collections. After all, museums hold many objects whose use is subject to legal or ethical constraints.<sup>27</sup> The first two research questions on 'regulatory frameworks' and 'ethical principles', respectively, are thus designed to explore the nature of these demands and what they mean for the Armouries' registrar staff. Thereby, this study aims to draw greater attention to the role of registrars in enabling museums to observe their many legal, professional, and ethical commitments. By comparison, the

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<sup>26</sup> Erin McKeen, 'The Straw that Stirs the Drink – The Role of the Registrar in the Museum World', in *MRM6: Museum Registration Methods*, ed. by John E. Simmons and Toni M. Kiser, 6th edn (Lanham: Rowman & Littlefield, 2020), pp. 17-20 (pp. 18-19).

<sup>27</sup> Freda Matassa, *Organizing Exhibitions: A Handbook for Museums, Libraries and Archives* (London: Facet Publishing, 2014), pp. 33-34.

relationship of access – the third major theme of this study – to registrar practice is rather less straightforward. Unlike legal and ethical compliance, it does not possess an obvious equivalent among the functions set out in Figure 1. Nonetheless, the general scope of registrar practice helps to clarify its relationship with access in a museum setting. As collections professionals, registrars primarily engage with its distinct manifestation of ‘collections access’. This formulation is explored in greater depth in Chapter 4, but it can be summarised as individual proximity to museum objects and their associated information.<sup>28</sup> Many of the functions constituting registrar practice contribute to this outcome. Documentation enables museums to know what collections can be used for public access; condition reporting ensures that individual objects are robust enough to be accessed; object movement brings collections and those accessing them together; loans and exhibitions management provide the operational groundwork for these key access initiatives, and so forth. A strong case can thus be made that collections access is a fundamental goal of registrar practice.<sup>29</sup> This may be convincing from a conceptual standpoint, but it must also reflect institutional realities. Existing accounts of collections management as a cornerstone of museum programming have predominantly taken the form of general overviews rather than detailed case studies.<sup>30</sup> To redress this situation, this study seeks to convey the complex operational apparatus underpinning the provision of collections access through the routine experiences of registrars. This requires institutional cultivation of a wide range of legal, ethical, and procedural expertise that underlies contemporary registrar practice. Their contribution is decisive in facilitating the Armouries’ unique offer.

### **The Institution: The Royal Armouries**

The Armouries represents an intriguing case study for any investigation of museum practice. It has not always existed in its current form. Over the course of its 700-year history, the Armouries has operated as an armoury, a storehouse, a tourist attraction, a monument to martial prowess, and has only become a museum in its latest incarnation.<sup>31</sup>

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<sup>28</sup> Royal Armouries, *Collections Access Policy* (Leeds: Royal Armouries, 2019), p. 3.

<sup>29</sup> Case, pp. 19-20.

<sup>30</sup> Suzanne Keene, *Fragments of the World: Uses of Museum Collections* (Oxford: Elsevier Butterworth-Heinemann, 2005), p. 180; Matassa, *Museum Collections Management*, pp. 229-43; Miller, pp. 85-86.

<sup>31</sup> Michael S. Lacy, 'Students of Arms: A Survey of Arms and Armour Study in Great Britain from the Eighteenth Century to the First World War' (unpublished doctoral thesis, University of Reading, 1998), pp. 9-11.

Whatever its prevailing role, its collection of arms and armour has remained a core element of its unique institutional identity. This is certainly true of the Armouries' time as a public museum, which itself has a long history. It seems no coincidence that the first concerted attempts during the early nineteenth century to systematically manage and interpret its collections were pursued alongside measures to make it accessible to a wider public.<sup>32</sup> These have essentially remained the defining aspirations of the Armouries ever since. Of course, its organisational structure has changed markedly over the succeeding two centuries. The contemporary form of the Armouries is largely a product of the last few decades. The first transformative development was the expansion beyond its traditional base at the Tower of London. During the 1990s, the majority of its objects and institutional personnel were relocated to a new purpose-built museum in Leeds, the artillery holdings were transferred to Fort Nelson near Portsmouth, and the White Tower was redisplayed to showcase its historic functions.<sup>33</sup> This arrangement has effectively remained unaltered to the present day, presenting its registrar staff with all the opportunities and challenges of operating multiple sites. The other major transformation in the Armouries' recent history relates to its governance as a public institution. The *National Heritage Act 1983* legally established it as the repository for a 'national collection of arms, armour and associated objects'.<sup>34</sup> This statute has since provided the formal basis for the Armouries' status as the national museum of arms and armour. This title might appear straightforward, but it actually incorporates two distinct (and often divergent) roles: the Armouries as a public national museum and the Armouries as the custodian of a major weapons collection. This dual identity continues to have profound ramifications for its operational conduct.

On the one hand, the Armouries' role as a prominent public museum commits it to a range of duties befitting this status. These originate in the *National Heritage Act 1983* itself. This legislation outlines the Armouries' five main obligations as steward of the national collection of arms and armour: promoting public appreciation of arms and armour, exhibiting its objects, making its objects available for study, maintaining thorough records of its objects, and preserving and augmenting the overall collection.<sup>35</sup>

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<sup>32</sup> Malcolm Mercer, 'Samuel Meyrick, the Tower Storekeepers, and the Rearrangement of the Tower's Historic Collections of Arms and Armour, c. 1821-69', *Arms & Armour*, 10 (2013), 114-27 (pp. 115-18).

<sup>33</sup> Royal Armouries, 'History of the Royal Armouries' <<https://royalarmouries.org/about-us/history-of-the-royal-armouries/>> [accessed 24 April 2023].

<sup>34</sup> *National Heritage Act 1983*, p. 11.

<sup>35</sup> Board of Trustees of the Royal Armouries, p. 2.

The first three provisions directly charge the Armouries with making its collections accessible in various forms, while the latter two indirectly support this outcome through their focus on effective management. Simultaneously, this statute designates the Armouries as a ‘national museum’. This has a specific meaning in a British context – a museum enshrined in law that receives grant-in-aid funding in return for the delivery of certain functions and government priorities set out in a management agreement.<sup>36</sup> This arrangement has two major consequences for the Armouries’ operations. Firstly, it is subject to government authority through its accountability to the Department of Culture, Media & Sport (DCMS).<sup>37</sup> Although this is limited in theory by discretionary observation of the ‘arms-length principle’, direct political intervention can never be ruled out. Secondly, its receipt of tax revenue raises the expectation that the Armouries will actively place its resources and services at the public’s disposal.<sup>38</sup> This includes its objects, further reinforcing its legal duty to provide collections access. Beyond its immediate governance structures, the Armouries also subscribes to a range of professional codes and guidelines designed to foster best practice throughout the museum sector. These standards place considerable emphasis on outlining ethical conduct in the acquisition, maintenance, and use of cultural collections.<sup>39</sup> In particular, the principle of collections access for all is a prominent and recurring theme throughout these structures. It is explicitly raised by many of the professional frameworks that the Armouries observes.<sup>40</sup> The apparatus of museological governance – legal, political, professional, and ethical – thus foregrounds the Armouries’ obligations to wider society. The impetus for collections access pervades all levels of its operational framework, with important consequences for the institutional performance of registrar practice.

However, this museological commitment to accessibility is seriously challenged by the fact that weapons constitute a large proportion of the Armouries’ collections. As

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<sup>36</sup> Department for Digital, Culture, Media & Sport, *Strategic Review of DCMS-Sponsored Museums* (London: Department for Digital, Culture, Media & Sport, 2017), p. 54.

<sup>37</sup> Sara Selwood and Stuart Davies, 'Policies, Frameworks, and Legislation: The Conditions Under Which English Museums Operate', in *The International Handbooks of Museum Studies*, ed. by Helen Rees Leahy and Sharon Macdonald, 4 vols (Chichester: John Wiley & Sons, 2015), II: *Museum Practice*, ed. by Conal McCarthy, pp. 43-68 (p. 50).

<sup>38</sup> Clive Gray and Vikki McCall, *The Role of Today's Museum* (London: Routledge, 2020), p. 45.

<sup>39</sup> Simmons, 'Collection Care and Management', pp. 229-30.

<sup>40</sup> Arts Council England, *Government Indemnity Scheme: Guidelines for National Institutions* (London: Arts Council England, 2016), p. 4; Museum Accreditation, *Accreditation Standard* (London: Arts Council England, 2018), p. 9; Museums Association, *Code of Ethics for Museums* (London: Museums Association, 2015), p. 10; International Council of Museums, *ICOM Code of Ethics for Museums* (Paris: International Council of Museums, 2017), p. 8.

such, all of its activities have to comply with the relevant provisions of British weapons law. Its object is twofold: preventing the purposeful use of weapons in criminal activity and reducing the likelihood of accidental harm.<sup>41</sup> The restrictions enacted in pursuit of these fundamental objectives – primarily physical in nature – are not conducive to the Armouries’ duty to provide access to its cultural collections. Nonetheless, there is a degree of flexibility built into this system. The severity of regulation differs from weapon to weapon, which is ultimately determined by their potential risk. This has resulted in a complex body of legislation, with a profusion of statutes spanning three distinct traditions – offensive weapons, firearms, and explosives.<sup>42</sup> The access restrictions on the Armouries’ weapons collections are thus variable, a key factor that must be accommodated by its registrar staff. Nor are its legislative obligations fixed. The parameters of weapons law evolve over time in response to changing circumstances and assumptions.<sup>43</sup> To fully understand the legal context in which the Armouries operates, it is necessary to examine the pressures that have galvanised legislative developments. There is a strong tendency for political leaders to legislate hastily in immediate response to major incidents, above all when existing measures are widely perceived as insufficient.<sup>44</sup> One consequence of the hurried formulation of new regulations is that their wider ramifications can be overlooked. Changes to weapons law can transform the Armouries’ operations, yet the needs of museums are rarely the priority of lawmakers. Moreover, there is scant guidance on the implications of weapons law for cultural collections.<sup>45</sup> It is therefore the role of the Armouries’ registrar staff to address its obligations as a major weapons repository, resulting from their professional duty to ensure legal and ethical compliance. This work is best understood by considering weapons law in its broadest sense, encompassing its content, its development, and its ramifications for museum practice. This study seeks to show how this expanded regulatory apparatus affects the Armouries’ collections, a crucial step in determining institutional strategies to promote engagement with these restricted objects.

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<sup>41</sup> Rudi Fortson, 'Acid, Knives, and Firearms: The Offensive Weapons Act 2019', *Criminal Law Review*, 2 (2020), 105-28 (p. 107).

<sup>42</sup> J. B. Hill, *Weapons Law*, 2nd edn (London: Sweet & Maxwell, 1995), pp. xi-xviii.

<sup>43</sup> Stuart Thomson, Lara Stancich, and Lisa Dickson, 'Gun Control and Snowdrop', *Parliamentary Affairs*, 51 (1998), 329-44 (pp. 341-43).

<sup>44</sup> Steffen Hurka, *Rampage Shootings and Gun Control: Politicization and Policy Change in Western Europe* (London: Routledge, 2017), pp. 155-57.

<sup>45</sup> Home Office, *Guide on Firearms Licensing Law* (London: Home Office, 2022), pp. 142-46; Home Office, *Firearms Security Handbook* (London: Home Office, 2020), pp. 19-23.

The competing pressures to both extend and restrict access to the Armouries' weapons collections thus represent a persistent tension at the heart of its activities.

The Armouries' mission to reconcile the regulation and use of its weapons collections has attracted a certain degree of scholarly interest. One expansive survey of its recent history is Derek Walker and Guy Wilson's *The Royal Armouries in Leeds*.<sup>46</sup> They document the relocation of its operations to Leeds in the 1990s, offering valuable insight into this enduring institutional overhaul. Beyond this, however, analysis of the Armouries' contemporary practice is surprisingly sparse given its national museum status. As no other studies have conducted a comparable assessment of its internal workings, newer information has to be sought elsewhere. The Armouries' in-house journal, *Arms & Armour*, has explored aspects of its collections practice. It has carried articles on its early cataloguing systems, the provenance of an experimental grenade launcher, and the process of conserving a gasmask.<sup>47</sup> While these works do reveal glimpses of institutional collections procedure, they hardly amount to a detailed account of weapons management at the Armouries. It is thus necessary to consult its overarching policy framework to augment this scarce critical material. Its components relate the Armouries' approach to its weapons collections at a number of operational levels. The broadest perspective is presented in multi-year corporate plans, most recently published for 2023-2028. This type of document shares its roadmap for institutional development, including the resolve to 'set the standard for arms and armour care and conservation'.<sup>48</sup> The Armouries' progress towards these strategic objectives is recorded in greater detail in its annual reports. Designed to ensure public accountability in its role as a national museum, they include a summary of progress across many facets of collections practice – acquisitions, loans, conservation, research, and records management.<sup>49</sup> Their value mainly lies in reporting the concrete actions of the Armouries' collections staff, even if the individual reviews only comprise a few paragraphs each. The central mechanism for directing these concerted efforts is a suite of institutional policies. Its collections are a salient feature of this structure, as the Armouries has produced eight documents just to

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<sup>46</sup> Derek Walker and Guy M. Wilson, *The Royal Armouries in Leeds: The Making of a Museum* (Leeds: Royal Armouries Museum, 1996).

<sup>47</sup> Thom Richardson, 'Armours in the "Line of Kings" in the Horse Armoury at the Tower', *Arms & Armour*, 10 (2013), 97-113; Jonathan S. Ferguson, 'The Blanch-Chevallier Discharger: A Shoulder-Fired Grenade Launcher for the Trenches', *Arms & Armour*, 11 (2014), 187-99; Suzanne Dalewicz-Kitto and Holly Marston, 'Asbestos in the Collection of the Royal Armouries and the Conservation of a First World War German Gasmask', *Arms & Armour*, 13 (2016), 177-89.

<sup>48</sup> Royal Armouries, *Corporate Plan 2023-2028* (Leeds: Royal Armouries, 2023), p. 3.

<sup>49</sup> Board of Trustees of the Royal Armouries, pp. 21-25.



govern various aspects of their treatment.<sup>50</sup> They reconcile corporate aims, statutory obligations, and sector standards to model effective collections stewardship. The final components of the Armouries' official apparatus are its operational procedures, which detail the practical measures required to achieve its policy objectives. These methodical guides outline the successive stages of numerous essential functions from cataloguing to security.<sup>51</sup> They complete the vital process of translating its fundamental mission to the level of everyday practice. Together, these documents broadly encapsulate the routine workings of collections practice at the Armouries. All of this material offers its own value to the critical examination of public engagement with museum weapons holdings.

### **Critical Museology: Negotiating the Intersection of Theory and Practice**

The previous two sections have revealed a number of rich research avenues that this study is well placed to address. The Armouries represents an instructive model for the management and use of restricted cultural collections. The regulations imposed on its weapons holdings emphasise the ongoing friction between the legislative requirements and public responsibilities of museums. The central role of its registrar staff in reconciling these claims also provides a valuable opportunity to examine the intricacies of collections practice and thereby anticipate strategies for its future development. The overarching structure of the study serves to articulate the operational realities of these interconnected phenomena. Each chapter builds on the conclusions of its predecessors, steadily drawing together the key threads to formulate a coherent response to the original brief. It works through the various frameworks governing the use of the Armouries' weapons collections before turning to the strategies implemented by its registrar staff to facilitate public engagement with them. Its overall structure thus corresponds to the main research questions: the first two chapters cover the intersecting regulatory structures of weapons law and museum standards, the third chapter addresses the role of ethics in its different manifestations, and the fourth considers the operational basis for collections access. Alongside these main subjects, this thesis is guided by certain key principles that transcend the thematic chapters, namely critical museology and assemblage theory. Reconciling these 'horizontal' and 'vertical' approaches (for want of a better analogy) works to this study's advantage. It has been possible to

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<sup>50</sup> Royal Armouries, 'Policies' <<https://royalarmouries.org/about-us/policies>> [accessed 19 October 2023].

<sup>51</sup> Royal Armouries, *Collections Policy Framework* (Leeds: Royal Armouries, 2019), p. 5.

investigate the subtleties of the major themes without losing sight of the project's guiding purpose: furthering access to museum collections restricted by law.

The first of the major precepts underpinning this thesis is 'critical museology', a means of questioning the conventional premises of museum work. Emphasising the study of the factors behind the development of museum practice, it offers a means to engage with the shifting dynamics of power and agency shaping contemporary museum work.<sup>52</sup> This criticality has a rich heritage. The notion of critical museology has been hewn out of the polysemic array of intellectual currents swirling around museums, such as new museology, postmodern philosophy, critical anthropology, and cultural sociology.<sup>53</sup> While these traditions have generated diverse readings of the museum, they have all proceeded on the assumption that its institutional purpose can be better realised through conceptual enquiry. Proponents of critical museology – including museum scholars, museum practitioners, art historians, and anthropologists – have drawn on this complex legacy by rejecting any separation of theory and practice, instead emphasising the value of their intersection to the pursuit of tangible change across the museum world.<sup>54</sup> In essence, it advocates the situated exploration of museum behaviours in all their complexity. Anthony Shelton, for example, has influentially envisioned critical museology as a continuous process of considered reflection by museum workers on their practice (as opposed to 'operational museology' that merely outlines current procedure).<sup>55</sup> It is a laudable goal, but reality often frustrates such ambitious initiatives. McCall and Gray make the compelling point that museum staff are usually preoccupied with their routine duties, so devoting time to rigorous self-evaluation is rarely feasible.<sup>56</sup> Despite the barriers to its proper realisation, critical museology remains a productive basis for this thesis given that self-examination is vital for stimulating ongoing development. As a three-year project dedicated to exploring registrar practice at the Armouries, this PhD has thus represented a valuable opportunity to practice critical museology in a sustained manner. Conal McCarthy offers an effective template for conducting research inspired by critical museology:

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<sup>52</sup> Rhiannon Mason, Alistair Robinson, and Emma Coffield, *Museum and Gallery Studies: The Basics* (Abingdon: Routledge, 2018), p. 21.

<sup>53</sup> Jesús-Pedro Lorente, *Reflections on Critical Museology: Inside and Outside Museums* (London: Routledge, 2022), pp. 10-15.

<sup>54</sup> Jesús-Pedro Lorente, 'The Development of Museum Studies in Universities: From Technical Training to Critical Museology', *Museum Management and Curatorship*, 27 (2012), 237-52 (pp. 243-44).

<sup>55</sup> Anthony Shelton, 'Critical Museology: A Manifesto', *Museum Worlds*, 1 (2013), 7-23 (p. 8).

<sup>56</sup> Vikki McCall and Clive Gray, 'Museums and the "New Museology": Theory, Practice and Organisational Change', *Museum Management and Curatorship*, 29 (2014), 19-35 (pp. 31-32).

My goal is to avoid a hypertheorized critique of museums from the outside, aiming instead for an informed internal account from professionals, academics, and critics in touch with the realities of everyday work in museums.<sup>57</sup>

This articulation has provided a blueprint for the thesis, emphasising the need for close cooperation with the Armouries' staff to fully appreciate its operations. As the quotation makes plain, failure to ground this research in the day-to-day activities of its collections department risks it being overwhelmed by theory and losing sight of its intended practical relevance. A Collaborative Doctoral Award (CDA) without sustained collaborative input is unlikely to succeed in its objectives. This study thus pursues an ongoing dialogue between theory and practice in order to better capture the intricacies of registrar work at the Armouries. By embedding the reflexive tradition of critical museology into the fabric of this thesis, the aim is to reach conclusions that are equally valuable to the Armouries, other institutions, and the field of museum studies.

As alluded to in the previous paragraph, this project has carried the further methodological complication of being structured as a formal collaborative initiative. As a CDA hosted between the Armouries and the University of Leeds, it has provided an unparalleled opportunity to strengthen the research partnership between these two institutions. Bridging the distinct occupational spheres of the museum and higher education has had both its advantages and disadvantages from a conceptual standpoint. One valuable feature of the CDA format is that it can offer an unparalleled level of access to researchers looking to engage critically with the routine workings of museum practice.<sup>58</sup> In relation to this PhD, institutional immersion took the form of a year-long placement working as a registrar trainee within the Armouries' collections department. Although postponed for eighteen months by the COVID-19 pandemic, this embedded position served as a foundational grounding in the operational realities of managing the national collection of arms and armour. Going beyond the mediated experience of investigating registrar practice as an external researcher, the situated experience of actually performing it on the ground at the Armouries has enriched the exploration of this shifting occupational world.<sup>59</sup> The synthesis of these complementary standpoints has been a key process in realising the aspirations of critical museology. But delivering

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<sup>57</sup> McCarthy, p. xli.

<sup>58</sup> Rachel Bates, 'Working with the National Army Museum: The Afterlife of the Crimea and the Benefits of a CDA', *Journal of Victorian Culture*, 23 (2018), 197-206 (p. 198).

<sup>59</sup> Michael Pickering, 'Experience and the Social World', in *Research Methods for Cultural Studies*, ed. by Michael Pickering (Edinburgh: Edinburgh University Press, 2008), pp. 17-31 (pp. 24-25).

on a collaborative research initiative has not been without its challenges. This project has been the first CDA involving the Armouries as a partner institution, so its development has proven a valuable learning experience across the board.<sup>60</sup> Regular communication within the supervisory team has thus been a central premise throughout the project, as a means of establishing clear research expectations and reporting progress on its delivery. The experience of being embedded within the Armouries' personnel structure has generated its own ethical hurdles, namely the ambiguous power dynamics at play in the dual capacity of a researcher-practitioner. Effective observation-based research relies on the flattening of relevant power differentials to encourage open discourse between all contributors – researchers and participants alike.<sup>61</sup> Given that two of the PhD supervisors are the two highest ranking members of the Armouries' collections department, their institutional seniority carried the risk of them exerting undue influence over the direction and content of the research. In order to circumvent this compromising situation, the placement was administered by staff members without direct oversight over the research outcomes. The involvement of other Armouries personnel had the added benefit of expanding the collegial group invested in the project, many of whom provided their own input in turn. Without these concerted efforts to develop robust dialogue with a range of museum stakeholders, it would have ultimately been much harder to deliver a credible account of contemporary weapons management.

Beyond my own experiences as an embedded researcher at the Armouries, its registrar staff have been a touchstone for this study – and crucial to its pursuit of critical museology. This project has recorded their thinking through qualitative interviews, a method suited to exploring 'experiences, opinions, attitudes, values, and processes'.<sup>62</sup> These are all vital elements of museum work. To best explore the complex realities of weapons management at the Armouries, interviews were conducted with the relevant practitioners between November 2021 and February 2023. This process yielded detailed discussions with the incumbent staff of its registrar department: the Registrar, Assistant Registrar, and Documentation Officer. A series of interviews were also held with their direct superiors, the Head of Collection Services and the Director of Collections (now

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<sup>60</sup> Board of Trustees of the Royal Armouries, *Annual Report and Accounts for the Year Ended 31 March 2021* (London: The Stationery Office, 2021), p. 22.

<sup>61</sup> Virginia Nightingale, 'Why Observing Matters', in *Research Methods for Cultural Studies*, ed. by Michael Pickering (Edinburgh: Edinburgh University Press, 2008), pp. 105-22.

<sup>62</sup> Jennifer Rowley, 'Conducting Research Interviews', *Management Research Review*, 35 (2012), 260-71 (p. 262).

Director of Collections, Research and Learning), who were invested in sharing their insight as partners in this CDA. While their role as both participants in and supervisors of the research raised a potential conflict of interest, overemphasis of their contribution has been mitigated by the incorporation of other staff perspectives and extensive consultation of the Armouries' policy framework. The collective expertise of these individuals in weapons management is scarcely matched elsewhere, so their testimony forms a core pillar of the thesis. From a methodological standpoint, the interviews were conducted with individual participants rather than as focus groups. While both approaches have their strengths, one-to-one interviews better suited this study's purposes: they allowed deeper discussions with each person; there was greater freedom to express independent observations; and, logistically, they were more feasible in the wake of a global pandemic.<sup>63</sup> The use of separate interviews thus sought to draw out the unique perspectives of each staff member, informed by their distinctive role in the weapons management process. These interviews were semi-structured so as to address the project objectives while allowing scope for the conversations to develop organically.<sup>64</sup> This provided a suitable balance between brevity and serendipity. The interviews were consciously structured to mirror the thematic chapters – covering legal controls, governance structures, ethical conduct, and access strategies – to better engage with the study's overarching research questions. Within this thematic framework, the interviews followed an event-based approach to capture key developments in the processes underpinning collections access at the Armouries.<sup>65</sup> Overall, these discussions revealed many valuable insights into registrar practice, providing a solid foundation for future research into this pivotal role. Through these interviews, this project has ultimately sought to record the unique outlook of the Armouries' collections personnel on weapons management as those responsible for its implementation.

To put the principles of critical museology into practice, a selection of case studies drawn from the Armouries' operations support the narrative development of this work. Case studies complement this research because they consider a subject 'in depth and within its real-world context, especially when the boundaries between phenomenon

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<sup>63</sup> Pranee Liamputtong, *Focus Group Methodology: Principles and Practice* (London: SAGE, 2016), p. 8; David L. Morgan, *Basic and Advanced Focus Groups* (Los Angeles: SAGE, 2019), p. 21.

<sup>64</sup> Anneke Meyer, 'Investigating Cultural Consumers', in *Research Methods for Cultural Studies*, ed. by Michael Pickering (Edinburgh: Edinburgh University Press, 2008), pp. 68-86 (pp. 80-81).

<sup>65</sup> Catherine Cassell, *Conducting Research Interviews for Business and Management Students* (Los Angeles: SAGE, 2015), p. 18.

and context may not be clearly evident'.<sup>66</sup> This is a valuable approach for a study embedded in the everyday realities of registrar practice at the Armouries. Key examples were chosen to illuminate the major themes outlined in the guiding research questions, following the overall structure of the thesis. Each chapter thus scrutinises a formative moment in the development of weapons management at the Armouries that speaks to its core issues. The first chapter considers the institutional ramifications of the UK ban on handguns imposed by the *Firearms (Amendment) Acts* of 1997, namely its historical contingency, its unintended consequences for museum practice, and its ongoing legacy. The second chapter utilises a routine visit of the National Security Adviser to the Armouries to explore the negotiated parameters, non-disciplinary character, and operational benchmarks of its governance frameworks. The third chapter examines its innovative co-curated exhibition 'At the Sharp End' to highlight the convergence of distinct ethical traditions, the omnipresence of ethics in museum practice, and the ethical paradoxes embodied in public weapons collections. Finally, the fourth chapter assesses the access arrangements to the Armouries' collections at the latest Weapons in Society conference, revealing an intersection of risk management, layered safeguards, and inter-departmental collaboration. Each of these instances provides a detailed snapshot of 'the day-to-day care of the collections as they move within the museum or between museums' that has long characterised the work of registrars.<sup>67</sup> Commencing every chapter with a revealing episode of registrar practice at the Armouries serves to ground the analysis in the daily routines of managing restricted collections. These case studies thus establish a solid foundation for the consistent pursuit of critical museology throughout this thesis. After all, refinement of the Armouries' strategies for facilitating engagement with its weapons collections cannot take place without meticulous examination of existing institutional processes.

### **Assemblage Theory: Addressing Complexity in the Museum**

In seeking to reflect the realities of everyday museum practice, this study must address its many heterogeneous drivers. Museums are by their nature complex organisations. They are constituted by a range of elements: 'activities, rules, norms, behaviours,

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<sup>66</sup> Robert K. Yin, *Case Study Research and Applications: Design and Methods*, 6th edn (Thousand Oaks: SAGE, 2018), p. 48.

<sup>67</sup> Fredericka Smith, Margaret Stewart, and Jonathan Mason, 'The UK Registrar: A Future in the Balance?', in *Collections Management for Museums: Proceedings of an International Conference*, ed. by D. Andrew Roberts (Cambridge: Museum Documentation Association, 1988), pp. 103-06 (p. 105).

materials, technologies, people and interactions.<sup>68</sup> Considering the case studies summarised in the previous paragraph, the Armouries certainly fits this picture. Like all museums, it is subject to a shifting array of internal and external pressures that determine its scope for action.<sup>69</sup> It is thus essential to recognise the Armouries' unique institutional composition while also remaining attuned to the broader cultural, political, and legal contexts in which it operates. In order to accommodate such organisational complexity, this thesis adopts the precepts of assemblage theory. This approach itself has longstanding if fragmented intellectual roots. The first major tradition associated with the development of the assemblage discourse proceeded from the work of Gilles Deleuze and Félix Guattari. Their conceptualisation of social organisation as rhizomatic *agencements* characterised by the principles of interconnectivity, heterogeneity, and multiplicity has provided much of the conceptual groundwork for successive studies of the assembled.<sup>70</sup> One enduring legacy of this generative exercise has been to posit the assemblage as a grounded way of encountering reality in all its entangled richness. This premise applies equally to museum entities as to any other facet of observable existence. Another pervasive conceptual strand informing the development of assemblage theory has been the affiliated approach of actor-network theory. Emerging out of science and technology studies from the 1980s, one of its foundational injunctions is that researchers should 'follow the actors'.<sup>71</sup> This entails establishing the contribution of all human and non-human agents to any given phenomenon, without pre-emptively determining their relative importance. In its firm repudiation of hierarchical taxonomies, actor-network theory has thus further expanded the profusion of elements that may serve to constitute socio-material relations. The resemblance of assemblages and actor-networks is clearly evident in their respective efforts to articulate heterogeneous and emergent systems of association, but that is not to say they are identical in every respect. There is a nuanced but significant distinction in their integration of unexpected phenomena, for example, which exposes assemblage theory's embrace of the emergent in contrast to actor-

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<sup>68</sup> Nuala Morse, Bethany Rex, and Sarah Harvey Richardson, 'Methodologies for Researching the Museum as Organization', *Museum and Society*, 16 (2018), 112-23 (p. 113).

<sup>69</sup> Clive Gray, 'Structure, Agency and Museum Policies', *Museum and Society*, 14 (2016), 116-30 (pp. 117-18).

<sup>70</sup> Gilles Deleuze and Félix Guattari, *A Thousand Plateaus: Capitalism and Schizophrenia*, trans. by Brian Massumi (London: Athlone Press, 1988), pp. 7-8; John Law, 'Actor Network Theory and Material Semiotics', in *The New Blackwell Companion to Social Theory*, ed. by Bryan S. Turner (Chichester: Wiley-Blackwell, 2009), pp. 141-58 (pp. 145-46).

<sup>71</sup> Bruno Latour, *Reassembling the Social: An Introduction to Actor-Network-Theory* (Oxford: Oxford University Press, 2005), pp. 10-12.

network theory's preference for the fixed and stable.<sup>72</sup> In conceptual terms, it seems that an assemblage is more receptive to reconfiguration than a network. As the relational associations constituting the cultural world are regularly disrupted by the emergence of present and future possibilities, this thesis will therefore adopt the anticipatory emphasis of assemblage theory rather than its actor-network counterpart. After all, analysis of the contemporary museum should acknowledge its pressing need to accommodate change.

Having determined assemblage theory as a productive approach to the core matter of this thesis, its application to a museological context can now be considered in greater depth. There is no shortage of conceptual material to guide this endeavour. To reference the occupational definition endorsed by the International Council of Museums (ICOM), museums are in essence institutions dedicated to the propagation of world culture.<sup>73</sup> Both of these defining characteristics – cultural engagement and institutional composition – have been addressed extensively by the scholarship around assemblage theory. The challenge lies in aligning these debates. Transcending its original roots in sociology and philosophy, the assemblage has been readily employed as a constructive way of exploring the generation and incarnation of culture in modern societies. Sharon Macdonald has deftly expressed its general value to the study of cultural heritage:

Taking an assemblage perspective on heritage directs our attention less to finished 'heritage products' than to processes and entanglements involved in their coming into being and continuation [...] it focuses on tracing the courses of action, associations, practical and definitional procedures and techniques that are involved in particular cases.<sup>74</sup>

In short, this focus on dialogue and exchange can offer valuable insight into routine operational actions that are often eclipsed by the end result. Given that museum work is constituted by the same negotiated networks of agents, processes, and affiliations, the concept of the assemblage has much to offer in articulating its evolving contribution to cultural life. It admits the decisive role of the mundane, the transient, and the obscure in informing the development of accepted museological conduct. In parallel to the discourse around the assembled nature of the cultural practices performed by museums,

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<sup>72</sup> Martin Müller and Carolin Schurr, 'Assemblage Thinking and Actor-Network Theory: Conjunctions, Disjunctions, Cross-Fertilisations', *Transactions of the Institute of British Geographers*, 41 (2016), 217-29 (p. 219).

<sup>73</sup> International Council of Museums, 'Museum Definition' <<https://icom.museum/en/resources/standards-guidelines/museum-definition/>> [accessed 27 September 2022].

<sup>74</sup> Sharon Macdonald, 'Reassembling Nuremberg, Reassembling Heritage', *Journal of Cultural Economy*, 2 (2009), 117-34 (p. 118).



another body of work addresses the configuration of the institution itself. As social organisations, museums are not only assemblages themselves – constituted by myriad interpersonal, physical, hierarchical, legal, bureaucratic, and discursive relations – but are also identifiable actors in assemblages of greater magnitude.<sup>75</sup> While the Armouries might thus appear as a single hegemonic entity in dialogue with equally homogenous bodies to an external observer, it could equally be perceived as a constellation of departments, relationships, and spaces by one of its staff members. It is all a matter of perspective. This notion of organisations as indeterminate associational assemblages has made notable headway in museum studies as a means of encapsulating their contextual interdependence. A recent review of museological research has been able to dedicate an entire section to prevailing studies of ‘museums as assembled organisations’.<sup>76</sup> In its pursuit of the intersecting drivers of registrar practice at the Armouries, this thesis can thus build on a wealth of accumulated learning. Conceptualising the museum as an assembly of human and non-human actors is generating insightful new readings of this enduring cultural institution, so there is every reason to believe that it will have the same result for the routine enactment of weapons management.

Assemblage theory can help to articulate the intricacies of weapons regulation. There are few museum objects as heavily controlled as weapons, resulting from their enduring association with violence. A multitude of laws, directives, and standards govern these collections, affecting the interactions of museum staff and visitors alike. Its apparatus thus incorporates many of the ‘heterogeneous elements’ – artefacts, people, texts, organisations – that characterise cultural assemblages.<sup>77</sup> People and texts are especially pertinent to the subject of regulation. Societies routinely enshrine regulations in documents to foster and perpetuate desired behaviours, with museums being no exception.<sup>78</sup> But this process works both ways, as existing instruments guide the thinking of those charged with formulating new regulations. Research into the relationship between documentary infrastructures and museum practice has explored this reciprocal exchange. Bethany Rex has utilised assemblage theory to scrutinise the entrenched role of documentation in museums, emphasising its power to determine the

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<sup>75</sup> Manuel DeLanda, *A New Philosophy of Society: Assemblage Theory and Social Complexity* (London: Continuum, 2006).

<sup>76</sup> Morse, Rex, and Richardson, pp. 117-18.

<sup>77</sup> Tony Bennett and Chris Healy, 'Assembling Culture', *Journal of Cultural Economy*, 2 (2009), 3-10 (p. 4).

<sup>78</sup> *Museum Ethics*, ed. by Gary Edson (London: Routledge, 1997), p. 24.

shifting parameters of institutional ‘work worlds’.<sup>79</sup> Pursuing this approach therefore helps to clarify the restrictions on the Armouries’ collections, which are a product of ongoing dialogue between codified measures, enforcing authorities, and museum practitioners. Using assemblage theory to interrogate this regulatory framework also emphasises that each of its constituent elements is itself a synthesis of numerous interactions. To paraphrase Rex, every provision is ‘the fine edge of a whole series of mobilisations’.<sup>80</sup> While individual laws respond to the legal, political, and social context of their creation, they are as much shaped by prior debate and subsequent interpretation. Likewise, the apparatus of museum governance conceals an array of underlying conventions and behaviours that are only revealed on close inspection. Finally, ethical statements draw on the assorted beliefs, ideals, and assumptions that inform museum practice – a snapshot of ongoing sector discourse.<sup>81</sup> Without this expanded perspective, any study into the regulation of museum objects would be superficial at best. Utilising assemblage theory, the first three chapters thus seek to navigate the interconnected networks of statutes, standards, and principles that constitute the regulatory assemblage governing museum weapons collections. This work ultimately serves to establish the parameters determining the routine conduct of the Armouries’ registrar staff.

These same characteristics also make assemblage theory an effective means of negotiating the everyday realities of weapons management. It does stress the substantial and varied contribution of museum registrars to this endeavour, as many of the common constituent functions of registrar practice collated in Figure 1 support museum use of weapons collections. This breadth helps to articulate the sophisticated strategies developed by registrars to facilitate access to restricted collections. Moreover, assemblage theory recognises the diverse factors that inform this work. Following its conceptual logic, these agents may be human or non-human, individual or communal, localised or widespread, emergent or entrenched, immediate or protracted.<sup>82</sup> In the case of weapons management at the Armouries, this expansive outlook encompasses actors well beyond its regulatory apparatus. Legal constraints, professional conduct, ethical

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<sup>79</sup> Bethany Rex, 'Exploring Relations to Documents and Documentary Infrastructures: The Case of Museum Management After Austerity', *Museum and Society*, 16 (2018), 187-200 (pp. 188-89).

<sup>80</sup> Rex, p. 192.

<sup>81</sup> Janet Marstine, Jocelyn Dodd, and Ceri Jones, 'Reconceptualizing Museum Ethics for the Twenty-First Century: A View from the Field', in *The International Handbooks of Museum Studies*, ed. by Helen Rees Leahy and Sharon Macdonald, 4 vols (Chichester: John Wiley & Sons, 2015), II: *Museum Practice*, ed. by Conal McCarthy, pp. 69-96 (pp. 69-70).

<sup>82</sup> Sarah Harvey Richardson, 'The Art Gallery and Its Audience: Reflecting on Scale and Spatiality in Practice and Theory', *Museum and Society*, 16 (2018), 201-19 (pp. 202-03).

standards, technological systems, administrative procedures, institutional policy, staff relationships, and individual experience all guide the actions of its registrar team to varying degrees.<sup>83</sup> Assemblage theory encourages the assessment of the relative impact of these elements on their own terms rather than according to any preconceived formula. In this respect, it complements the focused case studies that advance the main themes of this study. Dissecting indicative moments of registrar practice at the Armouries helps to discern the networks of actors that inform the use of its weapons collections. The fourth chapter of this thesis augments these contributions by systematically examining how the unique demands of weapons regulation intersect with the composite remit of registrar practice. The complexity of these interactions should not be underestimated. This becomes especially apparent when the contingent nature of registrar work itself is considered. Perceptions of the role are constantly being negotiated and renegotiated in the course of its everyday performance.<sup>84</sup> Assemblage theory's emphasis of processes and entanglements makes it especially receptive to change. For a study seeking to show how registrars interact with mutable concepts like regulation, access, and ethics, this capacity to accommodate shifting realities is invaluable. The continuing relevance of museums depends on their ability to adapt to new circumstances.<sup>85</sup> By applying assemblage theory to the intersection of registrar practice and weapons management, this thesis seeks to express their evolving interplay in an intelligible manner. After all, one of its fundamental objectives is to highlight the indispensable contribution of the Armouries' registrar staff to the institutional provision of collections access.

### **The Literature: Assembling a Composite Scholarship**

As might be expected from a study that seeks to bring together such an array of themes and concepts to address the lack of scholarship around the responsible stewardship of museum weapons collections, its source material is comparably diffuse. While its core focus on registrar practice at the Armouries indicates a predominantly museological approach, this thesis is by no means confined to the subject. The need to establish the binding parameters of weapons law that govern its entire operations, for example, entails the consultation of relevant legal commentaries. As the tensions between

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<sup>83</sup> Vassal and Daynes-Diallo, pp. 65-66.

<sup>84</sup> Bowes, pp. 64-65.

<sup>85</sup> Graham Black, *Museums and the Challenge of Change: Old Institutions in a New World* (London: Routledge, 2020), pp. 3-4.

weapons regulation and collections access occupy a central place in this project, legal debate has to be harmonised with museum interpretation of key provisions. Harnessing an interdisciplinary body of knowledge creates a stronger basis for working through these competing motivations. Even within the discipline of museum studies, this thesis must draw on numerous fields and approaches to produce a nuanced account of access to restricted collections. Over the last few decades, an established body of critical thinking has developed around various facets of museum practice – often grouped under the convenient shorthand of ‘New Museology’.<sup>86</sup> Any study of the contemporary museum has to navigate this formidable discourse. This multifaceted examination of public engagement with the Armouries’ holdings embraces scholarship across the fields of collections management, governance, ethics, and access. In each case, however, these major strands of museum studies are inflected by the unique concerns of weapons collections. How then should the intersection of these distinct and specialist domains be accommodated? The solution adopted here is to extend the application of assemblage theory to encompass the literature review as well. The assembly of these significant (but often uneven) spheres of research should produce a holistic overview of weapons management in a cultural context.<sup>87</sup> This survey assesses the state of the prevailing research landscape as a means of sketching the contours of current debates and identifying any visible omissions. By summarising the overall strengths and limitations of the available literature, it is thus possible to determine the original contribution of this thesis to understandings of contemporary museum practice.

As collections have long been central to museum operations, it is natural that abundant attention has been paid to the principles and processes underpinning their management. Professional handbooks constitute one major dimension of this output, which seek to circulate models of collections stewardship across the sector. Registrar practice, collections management, and exhibitions management have all recently been addressed by dedicated primers.<sup>88</sup> The value of such guides to this thesis lies in their detailed account of the complex processes essential to routine museum work, whose basic principles underpin the Armouries’ operations. Alongside this more operational strand, there is also a growing body of critical enquiry into collections management.

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<sup>86</sup> Mason, Robinson, and Coffield, pp. 20-21.

<sup>87</sup> McCarthy, p. xl.

<sup>88</sup> *MRM6: Museum Registration Methods*; Matassa, *Museum Collections Management*; Matassa, *Organizing Exhibitions*.

Two chapters in *The International Handbooks of Museum Studies* convey the potential of this emerging discourse: John Simmons examines the history and theory underlying modern conceptions of collections management, while Malcolm Chapman considers the development of information management systems in museums.<sup>89</sup> Both studies articulate the finer points of their chosen topics supported by informative examples, but their analysis of these expansive subjects is necessarily curtailed by their brevity. There is certainly scope for further exploration of this rich discipline. A common theme of all the prior works is their focus on collections management in general rather than specific object types. The unique needs of museum weapons collections have still received a certain level of scrutiny. However, the existing research is more concerned with the challenges of interpretation than the mechanics of access. Numerous examples of the former can be cited: an expert roundtable discussion considers the conceptual issues around the public display of firearms; Siobhán Doyle reflects on the enduring emotive power of a bullet embedded in a brick from the 1916 Easter Rising; and James Scott examines common display typographies for objects associated with conflict.<sup>90</sup> While such studies are valuable to this thesis insofar as they explore the general treatment of weapons by museums, their coverage of underlying processes is incidental. Analysis of the specific domain of weapons management is much rarer. Rachel Adams' recent work on the care and curation of military collections is thus exceptional in providing an overview of the regulation, licensing, storage, care, handling, movement, and use of weapons.<sup>91</sup> Her survey thus represents an important reference point for this study, even though it only encompasses a few pages. Given that this brief summary is the most extensive examination of weapons management in museums at present, there is a clear need for further research into the field. As the national museum of arms and armour, the working practices of the Armouries constitute a fertile case study for this endeavour.

Any examination of weapons management in a museum setting cannot ignore the instrumental role of legislation. This is not a simple task given the dispersal of weapons law across a wide array of statutory formulations. Consulting legal summaries can help to clarify the terms of this accumulated material. A comprehensive model of

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<sup>89</sup> Simmons, 'Collection Care and Management'; Chapman.

<sup>90</sup> Jennifer Tucker and others, 'Display of Arms: A Roundtable Discussion about the Public Exhibition of Firearms and Their History', *Technology and Culture*, 59 (2018), 719-69; Siobhán Doyle, 'The Bullet in the Brick: The Materiality of Conflict in Museum Objects', *Arms & Armour*, 16 (2019), 105-16; James Scott, 'Objects and the Representation of War in Military Museums', *Museum and Society*, 13 (2015), 489-502.

<sup>91</sup> Adams, pp. 106-15.

this approach is J. B. Hill's *Weapons Law*, which outlines the sources, definitions, and implications of English law for almost any weapon imaginable.<sup>92</sup> Its main drawback is that it was last revised in 1995, so much of its content is outdated and does not cover a number of notable legal developments. It nonetheless remains an authority on the overall structure of English weapons law, especially as no other single work matches its scope. Rudi Fortson's recent article on the *Offensive Weapons Act 2019* assesses the latest major revision of offensive weapons regulation in depth, for instance, but it lacks range as it only focuses on the provisions of one statute.<sup>93</sup> For a thorough *and* up-to-date account of weapons law, it is necessary to look beyond published commentaries. The Crown Prosecution Service maintains accessible guidance on the practical application of offensive weapons law, firearms law, and explosives law.<sup>94</sup> While the judicial emphasis of this advice makes it less relevant to museum interests, it does provide a clear overview of current legal practice. The influence of weapons law on the Armouries' programming cannot be fully grasped through its text alone, as contingent pressures also play a major part in its operation. Situating legislation within its wider social context is thus a common conceptual approach, with the Dunblane Massacre of 1996 attracting particular attention. Researchers have examined its criminological background, the role of grassroots campaigns in its aftermath, and its comparative legislative impact within a European frame of firearms control.<sup>95</sup> These works all make it clear that weapons law is not a fixed edifice formulated in a vacuum, but a constellation of regulations evolving in response to the concerns of contemporary society. What is currently missing from this expanded conception of the legislative sphere is analysis of its cultural dimension. While Malaro and DeAngelis have conducted a systematic evaluation of the legal apparatus surrounding museum collections, this only applies to the US and does not address the control of weapons.<sup>96</sup> No similar publications appear so far to have explored the implications of weapons law for British museums. The intersection of legislative

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<sup>92</sup> Hill.

<sup>93</sup> Fortson.

<sup>94</sup> Crown Prosecution Service, 'Offensive Weapons, Knives, Bladed and Pointed Articles' (2023) <<https://www.cps.gov.uk/legal-guidance/offensive-weapons-knives-bladed-and-pointed-articles>> [accessed 20 October 2023]; Crown Prosecution Service, 'Firearms' (2021) <<https://www.cps.gov.uk/legal-guidance/firearms>> [accessed 20 October 2023]; Crown Prosecution Service, 'Explosives' (2020) <<https://www.cps.gov.uk/legal-guidance/explosives>> [accessed 20 October 2023].

<sup>95</sup> David Wilson, Elizabeth Yardley, and Sarah Pemberton, "The "Dunblane Massacre" as a "Photosensitive Plate", *Crime, Media, Culture*, 13 (2017), 55-68; Thomson, Stancich, and Dickson; Hurka, pp. 110-13.

<sup>96</sup> Marie C. Malaro and Ildiko Pogány DeAngelis, *A Legal Primer on Managing Museum Collections*, 3rd edn (Washington, DC: Smithsonian Books, 2012).

structures, museum practice, and weapons management is thus overdue critical appraisal. Given the scarcity of material on the subject, this thesis seeks to determine the impact of this legislation through the lens of the Armouries' weapons collections.

Weapons law is not the only apparatus that governs the Armouries' operations, as it is also subject to a parallel series of political and professional frameworks. Sara Selwood and Stuart Davies have published a valuable overview of these regulatory arrangements in the context of the English museum sector.<sup>97</sup> By examining the holistic development of cultural policy initiatives and the authorities responsible, this work emphasises the interconnected nature of contemporary governance structures. This broad survey is complemented by focused studies into the individual entities that populate the cultural landscape. The political influence of DCMS is one of the better documented elements. The Strategic Review of DCMS-Sponsored Museums and the Mendoza Review have respectively assessed its oversight of national institutions and of the museum sector overall.<sup>98</sup> Together, these reports convey the policy environment that all UK museums negotiate on a routine basis. Likewise, the workings of Museum Accreditation have also attracted critical interest. Both the Mapping Museums project team and Bethany Rex have explored distinct aspects of its multifaceted role in shaping professional values and behaviours.<sup>99</sup> The direct relevance of their articles to this thesis, however, is limited by their respective focus on Accreditation's contribution to sector representation and workforce development rather than its codification of best practice in collections stewardship. The minimal scholarship on the role of collections management standards is even plainer in relation to other key structures. Certain frameworks – the Government Indemnity Scheme, Spectrum, and BS EN 17820:2023 – are notably absent from the critical discourse. While there is sufficient material then to outline the general nature of museum governance, its impact on weapons management requires further scrutiny. In order to meet this array of provisions, museums have developed concerted strategies to assure compliance throughout their activities. There is a clear body of work examining institutional engagement with governance frameworks, which owes much to the combined efforts of Clive Gray and Vikki McCall. They have considered museum approaches to a number of key concerns: government strategy, New Museology, the

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<sup>97</sup> Selwood and Davies.

<sup>98</sup> Neil Mendoza, *The Mendoza Review: An Independent Review of Museums in England* (London: Department for Digital, Culture, Media & Sport, 2017); Department for Digital, Culture, Media & Sport.

<sup>99</sup> Fiona Candlin and others, 'The Missing Museums: Accreditation, Surveys, and an Alternative Account of the UK Museum Sector', *Cultural Trends*, 29 (2020), 50-67; Rex.

policy-practice gap, and competing agency.<sup>100</sup> Their research to date has culminated in the monograph *The Role of Today's Museum*. This study brings together the major threads of their earlier work to affirm that the perceived roles of museums are intimately connected with public assumptions and cultural priorities.<sup>101</sup> Gray and McCall's cumulative output thus determines that the activities of individual museums cannot be divorced from their broader political or social contexts. Fundamentally, the literature on museum governance emphasises that common notions of professional practice emerge through ongoing dialogue across the sector and beyond – a process manifested in the many regulations, standards, and guidelines governing the actions of the Armouries.

As stewards of shared cultural heritage, museums look to numerous expressions of ethical conduct as a means of maintaining their operational integrity. Gary Edson's *Museum Ethics* was the first work to tackle this eponymous subject in depth.<sup>102</sup> Although its analysis of museum ethics has now been superseded in many respects, his thorough examination of the prevailing array of professional standards, guidelines, and principles remains a useful overview of the field. Codes of ethics are a central feature of this discourse, as the product of concerted sector efforts to articulate responsible museum practice.<sup>103</sup> Given their resulting prominence, it follows that these ethical frameworks have since been the subject of dedicated study. The latest iterations of the official codes published by the Museums Association and ICOM have both been subject to close scrutiny.<sup>104</sup> After all, their terms offer a salient model of professional conduct across a range of key topics. From a broader standpoint, Tristram Besterman's outline chapter on museum ethics provides an effective summary of the overlapping sources of potential guidance.<sup>105</sup> Its value lies in the rationalisation of this complex ethical landscape, where standards of practice are determined as much by wider social ideals as shared professional conduct. Some observers have sought to move away from codified expressions of museum ethics entirely, pursuing alternative models that are held to

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<sup>100</sup> Clive Gray, 'Museums, Galleries, Politics and Management', *Public Policy and Administration*, 26 (2011), 45-61; McCall and Gray; Vikki McCall, 'Exploring the Gap between Museum Policy and Practice: A Comparative Analysis of Scottish, English and Welsh Local Authority Museum Services', *Museum and Society*, 14 (2016), 98-115; Gray, 'Structure, Agency and Museum Policies'.

<sup>101</sup> Gray and McCall, p. 169.

<sup>102</sup> *Museum Ethics*.

<sup>103</sup> Emily G. Nicholson and Stephen L. Williams, 'Professional Ethics Revisited', *Curator: The Museum Journal*, 45 (2002), 173-78 (pp. 173-74).

<sup>104</sup> Janet Ulph, 'The Museums Association's Code of Ethics 2015', *Art, Antiquity and Law*, 21 (2016), 143-56; *Museums, Ethics and Cultural Heritage*, ed. by Bernice L. Murphy (London: Routledge, 2016).

<sup>105</sup> Tristram Besterman, 'Museum Ethics', in *A Companion to Museum Studies*, ed. by Sharon Macdonald (Oxford: Blackwell Publishers, 2006), pp. 431-41.



better reflect the constant evolution of socially engaged practice. Janet Marstine, for example, has proposed a versatile ‘new museum ethics’ that can respond more dynamically to the nuances of modern museum work than inflexible codes.<sup>106</sup> There have been sustained efforts to realise this proactive approach to museum ethics. Through a series of participatory workshops, Marstine, Jocelyn Dodd, and Ceri Jones demonstrated the value of collaborative and generative discourse to the articulation of ethical practice in museums.<sup>107</sup> These works affirm that ethical standards should not be viewed as natural constants to be set down at will; instead, they are negotiated values emerging from open dialogue across the museum sector. This notion has since been applied to collections management. The clearest expression of current debates in the field is Steven Miller’s *Museum Collection Ethics*, which reflects on a series of pressing issues – authority, authenticity, access, provenance, stewardship, and regulation.<sup>108</sup> Its importance is cemented by the fact that no published studies appear to have examined the unique ethical challenges of looking after restricted objects. At present, general analysis of collection ethics offers the only available insight into the specific demands of weapons management. While the prevailing literature on museum ethics does then provide a starting point for this thesis, a detailed investigation into the ethical basis for registrar practice at the Armouries thus holds great potential to strengthen the field.

As institutions professing to maintain cultural heritage on behalf of society, museums have a duty to share their collections with the widest possible audience. The importance of their public role is reflected by the volume of works that have explored the multifaceted nature of access in a museum context. Richard Sandell provided conceptual clarity in the early stages of this discourse, framing access as the opportunity to benefit from museum services through sustained and varied participation.<sup>109</sup> Building on this assessment, numerous studies have sought to identify the prevailing obstacles to engagement as the first step in redressing them. The terminology used to classify these access barriers has varied (spatial, communicative, social, and sensorial, for example, compared with physical, sensory, intellectual, financial, emotional/attitudinal, and

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<sup>106</sup> Janet Marstine, 'The Contingent Nature of the New Museum Ethics', in *The Routledge Companion to Museum Ethics: Redefining Ethics for the Twenty-First Century Museum*, ed. by Janet Marstine (Abingdon: Routledge, 2011), pp. 3-25.

<sup>107</sup> Marstine, Dodd, and Jones.

<sup>108</sup> Miller.

<sup>109</sup> Richard Sandell, 'Museums as Agents of Social Inclusion', *Museum Management and Curatorship*, 17 (1998), 401-18 (p. 410).

cultural).<sup>110</sup> Yet the broad resemblance of these themes indicates that museums face common challenges in their delivery of effective programming. As this thesis seeks to explore the mobilisation of restricted objects for public benefit, it prioritises those works that address the barriers to various forms of collections engagement. Suzanne Keene's *Fragments of the World* is notable for its systematic examination of the core role of collections in public museum outputs, exploring the many opportunities and challenges this entails. By surveying the processes integral to the various uses of their objects (such as research, learning, memory, creativity, and enjoyment), this book consistently affirms that museums cannot adopt a uniform approach to collections access.<sup>111</sup> While weapons are never raised explicitly, this principle is vital to the Armouries' collections strategy as a means of accommodating their greater physical regulation. One solution has been the extension of its access provision to the digital sphere, whose transformative impact is a prominent theme of museological debate.<sup>112</sup> Research into the shifting interplay of museums, collections, and virtual platforms has been sharpened by the experience of the COVID-19 pandemic. A growing group of studies are revisiting institutional initiatives to deliver meaningful forms of digital access – collections databases, online exhibitions, hybrid installations, and social media – while physical venues were closed.<sup>113</sup> This shift towards digital practice has also accentuated the equivocal relationship of virtual collections engagement to other modes of access. Researchers have articulated the unique materiality of digital museum objects, questioning the secondary status often ascribed to them relative to encounters with the 'real thing'.<sup>114</sup> However, there has been little exploration of what this emerging hybrid reality means for the dissemination of restricted collections. The current literature on access in museums, both physical and

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<sup>110</sup> Nikolas Papadimitriou and others, 'Identifying Accessibility Barriers in Heritage Museums: Conceptual Challenges in a Period of Change', *Museum International*, 68.3-4 (2016), 33-47 (p. 34); Jocelyn Dodd and Richard Sandell, *Building Bridges: Guidance for Museums and Galleries on Developing New Audiences* (London: Museums and Galleries Commission, 1998); Mason, Robinson, and Coffield, p. 103.

<sup>111</sup> Keene.

<sup>112</sup> Black, pp. 44-48.

<sup>113</sup> Myrsini Samaroudi, Karina Rodriguez Echavarria, and Lara Perry, 'Heritage in Lockdown: Digital Provision of Memory Institutions in the UK and US of America during the COVID-19 Pandemic', *Museum Management and Curatorship*, 35 (2020), 337-61; Ellie King and others, 'Digital Responses of UK Museum Exhibitions to the COVID-19 Crisis, March – June 2020', *Curator: The Museum Journal*, 64 (2021), 487-504; Tula Giannini and Jonathan P. Bowen, 'Museums and Digital Culture: From Reality to Digitality in the Age of COVID-19', *Heritage*, 5 (2022), 192-214; Jenny Kidd, Eva Nieto McAvoy, and Ania Ostrowska, 'Negotiating Hybridity, Inequality, and Hyper-visibility: Museums and Galleries' Social Media Response to the COVID-19 Pandemic', *Cultural Trends* (2022), 1-18.

<sup>114</sup> Nicole Meehan, 'Digital Museum Objects and Memory: Postdigital Materiality, Aura and Value', *Curator: The Museum Journal*, 65 (2022), 417-34; Kostas Arvanitis and Chiara Zuanni, 'Digital (and) Materiality in Museums', *Museum and Society*, 19 (2021), 143-48.

digital, does effectively convey the general principles shaping public engagement with the Armouries' holdings. But it remains to be seen how its conclusions specifically apply to the routine use of its weapons collections in light of their unique constraints.

It is clear from this thematic synopsis of the available literature that there is plenty of material for this thesis to negotiate. In many areas, the volume of research has made sifting through potential sources of insight a much greater task than their initial collation. The discourse on access and inclusion in museums, to give one example, encompasses a vast array of studies, approaches, and initiatives whose exploration could constitute a book in its own right.<sup>115</sup> As such, it has only been viable to consider the works most relevant to the content of this thesis for reasons of clarity and brevity. Yet in spite of the evident abundance of published research, this overview has revealed certain disparities and gaps in the record. There are key collections management frameworks that are absent from the academic literature by all accounts, namely BS EN 17820:2023, Spectrum, and Government Indemnity. Given the central significance of professional benchmarks, critical investigation into the workings of these unexamined standards will further enrich the ongoing dialogue between the aspirations and realities of collections personnel.<sup>116</sup> It should certainly provide important insight into the routine demands of registrar practice. From the perspective of this thesis, perhaps the foremost subject not explored in the published discourse is the intersection of weapons management with the key concerns of museum studies. As such, there is ample scope to examine operational approaches to weapons collections through the notions of law, governance, ethics, and access. The thematic arrangement of this thesis, as expressed in its overarching research questions and chapter structure, has been formulated to systematically address this overlooked dimension of museum practice. This expansive investigation of museum weapons collections is especially important in the context of the Armouries, as its institutional workings are another area that has received scarce intellectual attention. There is clear institutional resolve to change this situation, exemplified by the adoption of the 'Royal Armouries Collection and its Public Role' as one of its strategic research priorities over the last five years.<sup>117</sup> As a leading authority on weapons management, the Armouries' operations represent an ideal subject for working through the complexities

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<sup>115</sup> Heather Pressman and Danielle Schulz, *The Art of Access: A Practical Guide for Museum Accessibility* (Lanham: Rowman & Littlefield, 2021), pp. 193-204.

<sup>116</sup> Rex, pp. 187-88.

<sup>117</sup> Royal Armouries, *Collections Research Strategy 2019-2024* (Leeds: Royal Armouries, 2019), p. 10.

of this largely uncharted field. Even themes long established in the existing literature – collections management, legislation, governance, ethics, access – may yield rich insights when applied to the unique setting of the national museum of arms and armour. This thesis thus strives to explore the shifting convergence of these major museological preoccupations through the lens of routine institutional practice. Much of its originality and value ultimately lies in the novel synthesis of this otherwise familiar material.

### **The Objective: Critical Collections Management**

The twin principles of critical museology and assemblage theory underpin this overdue investigation into the multifaceted practice of weapons management at the Armouries. Fundamentally, these conceptual choices can be ascribed to an emerging scholarship around ‘critical collections management’ that embraces the embeddedness of critical museology and the expansiveness of assemblage theory. As an approach, it emphasises ‘the broader political and institutional contexts which have stabilised and normalised the central technologies and practices associated with collections: the catalogue, access, and handling’.<sup>118</sup> Critical collections management thus foregrounds the tangled convergence of administrative procedures, institutional conventions, and professional standards that embody contemporary collections practice. In relative terms, it is a recent conceptual innovation. It first grew out of the innovative work of Cara Krmpotich and Hannah Turner around the stewardship of indigenous collections, but its analytical potential has since been adopted by a growing number of researchers working across museum studies and its position looks set to be cemented by a forthcoming collaborative monograph.<sup>119</sup> While critical collections management as a distinct area of study is still in its early stages, it harnesses a rich tradition of museological thinking around the theoretical basis of cultural collections. From the 1990s, it has been affirmed that all engagement with museum objects is heavily determined by ‘curatorial inheritance’, an accumulation of social traditions, inherited knowledges, and past decisions.<sup>120</sup> Over time, the focus of

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<sup>118</sup> Catherine A. Nichols, *Exchanging Objects: Nineteenth-Century Museum Anthropology at the Smithsonian Institution* (New York: Berghahn Books, 2021), p. 18.

<sup>119</sup> Cara Krmpotich, 'Unsettling Museum Catalogues', in *Indigenous Collections Symposium: Promising Practices, Challenging Issues, and Changing the System*, ed. by Indigenous Collections Symposium Working Group (Toronto: Ontario Museum Association, 2017), pp. 39-54 (p. 42); *Collections Management as Critical Museum Practice*, ed. by Cara Krmpotich and Alice Stevenson (London: UCL Press, forthcoming).

<sup>120</sup> Susan M. Pearce, *Museums, Objects and Collections: A Cultural Study* (Leicester: Leicester University Press, 1992), pp. 135-36.

these debates has subtly shifted from the collections themselves to the wider conditions of their institutional stewardship. In his overview of the field, for example, John Simmons devotes considerable attention to clarifying the intersecting operations of collections management.<sup>121</sup> This work and others like it may not have explicitly used the moniker of ‘critical collections management’, but they essentially share its principles in all but name. Building on these conceptual foundations, the approach aspires to generate greater critical engagement with the policies, procedures, and practices that constitute collections management in order to address the pressing issues faced by its practitioners. It proposes nothing less than a wholesale re-evaluation of the field, striving to inform the ‘mundane practices and everyday decision-making’ of museum departments as much as their ‘organisational policies and visions’.<sup>122</sup> This thesis seeks to achieve the same ends, albeit focused specifically on the unique context of the Armouries and the efforts of its registrar team to articulate best practice in the provision of access to its weapons holdings. Ultimately, the adoption of critical collections management is calculated to better anticipate the many challenges encountered in the course of managing restricted museum objects – expected or not.

In keeping with the principles of critical collections management, this thesis seeks to uncover the diverse factors that determine access to the Armouries’ weapons holdings. Routine engagement with these restricted collections generates a series of deep-rooted and interconnected queries. What sources of regulation exist in relation to museum weapons collections? What forces have prompted their development? Why have these regulatory frameworks taken their current form? How do their distinct terms interact with one another? How are they interpreted by different stakeholders? How do the Armouries’ registrar staff process and respond to their provisions? What strategies do they implement to facilitate access to its restricted collections in a legal and ethical manner? How does the treatment of weapons differ from other types of objects? Should museums even hold weapons collections in light of their particular challenges? This thesis works to develop a coherent response to this tangled knot of questions, which the Armouries and many other museums confront in the course of their duties.<sup>123</sup> Given the enormity and complexity of the subject, this exploration extends across four central chapters. The first of these concentrates on the extensive legislative restrictions that

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<sup>121</sup> Simmons, ‘Collection Care and Management’, pp. 235-42.

<sup>122</sup> Nichols, p. 18.

<sup>123</sup> Adams, p. 101.

govern the possession, management, and use of weapons in a museum context. The second chapter examines the impact of various official standards relating to collections management produced by an amorphous group of professional and political bodies. The third chapter addresses the elusive role of ethics – variously manifested as sector codes, collaborative discourse, and core values – in determining institutional treatment of these challenging objects. Together, these first three chapters work through the multifaceted regulatory assemblage governing access to museum weapons collections. All of these frameworks affect the Armouries’ holdings in distinct ways, but it is their intersection that dictates the routine actions of its registrar staff.<sup>124</sup> The fourth chapter then explores the institutional strategies formulated to facilitate access to its weapons collections in light of these prevailing regulatory obligations. Through the lens of registrar practice, it identifies the interdependent measures necessary to fulfil the Armouries’ competing duties to assure public safety, national security, and popular engagement. Together, these explorations are designed to parse weapons management by considering its major thematic dimensions in turn. Hence the pursuit of critical collections management as a guiding approach that is able to accommodate embedded operational realities.<sup>125</sup> But it should be recognised that this is a two-way process. Few studies have sought to apply the principles of assemblage theory (or even actor-network theory) to the everyday realities of collections stewardship.<sup>126</sup> None appear to have applied this approach to either registrar practice or weapons management. By bringing these themes into open dialogue with one another, this investigation of the Armouries’ operations thus has much to offer the conceptual development of critical collections management in return. Museum treatment of weapons may not map directly onto other occupational priorities, but they are not the only objects subject to imposing legal and ethical controls.

In summary, this thesis seeks to augment critical understanding of museum registrars by using the Armouries’ routine operations to work through the challenges of facilitating access to restricted collections. To ensure that practice informs this research throughout, designated case studies of institutional weapons management establish a sound basis for the thematic chapters. These detailed examples introduce the major

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<sup>124</sup> Gray and McCall, p. 40.

<sup>125</sup> Hannah Turner, 'Critical Histories of Museum Catalogues', *Museum Anthropology*, 39 (2016), 102-10 (pp. 106-07).

<sup>126</sup> Laurie Waller, 'Curating Actor-Network Theory: Testing Object-Oriented Sociology in the Science Museum', *Museum and Society*, 14 (2016), 193-206 (pp. 194-95); Juhee Park, 'An Actor-Network Perspective on Collections Documentation and Data Practices at Museums', *Museum and Society*, 19 (2021), 237-51 (p. 240).

issues surrounding the regulation and management of these restricted collections, preparing the ground to explore the structural intricacies of registrar practice. The interview contributions of the Armouries' registrar team enrich the case studies with their practical insight and, more generally, keep the analysis grounded in the daily realities of collections management. Their agency is influenced by myriad interactions and negotiations, so any assessment that does not consider their engagement with the wider functional context will be flawed from the start. This thesis works to avoid this outcome by embedding the theory-practice axis that characterises effective institutional stewardship of material culture. By such means, it articulates recognised notions of responsible weapons stewardship with the aim of informing future procedure. Its systematic evaluation of the Armouries' distinct operational parameters thus represents an important original contribution to the field of museum studies. Another primary source of conceptual originality lies in the unique integration of the study's thematic preoccupations. No published work appears to have examined the tangled intersection of registrar practice, weapons collections, legislation, governance frameworks, ethics, and access. Their convergence in the work of the Armouries' registrar staff offers a valuable opportunity to interrogate the nature of their interplay. This thesis approaches the resulting exchanges through its main research questions, framed by the major museological concepts of regulation, ethics, and access. It is the role of the overarching methodologies of critical museology and assemblage theory to weave these distinct thematic strands into a cohesive narrative. Drawing from this core body of research material, it may then be possible to identify ways of easing the persistent tension between regulation and access that constrains engagement with restricted collections held in the public interest. The overall findings are articulated in a manner that both satisfies the objectives of this study and suggests new directions for research, guided by the principles of critical collections management. The ultimate objective of this thesis is to marry embedded institutional research with current museological thinking to reach new conclusions on registrar practice at the Armouries.

## Chapter 1: Weapons Regulation

Most of this legislation is not written with museums in mind. Sometimes the legislation mentions us, which is great, because other times legislation doesn't even mention museums and our activity. You come up against things when you start to do things because you start working it through and thinking, oh actually, that means that we can't do that, but that's what we've always done. Okay, maybe we aren't able to do that anymore, but is there a way we can do that? I think a lot of the legislation is written, has been written, as a knee-jerk reaction to an event or a series of events, actually then there are holes in the legislation. But that's the case with all legislation. There are definite holes in it and until you start to work through, and work through that practice, you can't think of everything before in an abstract manner. It doesn't always work like that. Sometimes these things will only come out as you work through it.<sup>127</sup>

On 13 March 1996, the deadliest mass shooting in British history took place. A gunman entered Dunblane Primary School with four legally owned handguns and proceeded to kill sixteen pupils and their teacher before turning the gun on himself.<sup>128</sup> This tragedy provoked a national outcry and strident calls for stricter regulation of such firearms, galvanising British lawmakers to act. In February 1997 the Conservative government designated all high-calibre handguns as 'prohibited weapons', which was then extended to small-calibre handguns by the incoming Labour government in November 1997.<sup>129</sup> Under the terms of the two *Firearms (Amendment) Acts* of 1997, the general possession of handguns was thus banned without special dispensation. This legislation reclassified them under the *Firearms Act 1968* from being Section 1 firearms (private ownership allowed with the correct licence) to Section 5 firearms (private ownership prohibited).<sup>130</sup> These changes have profoundly affected the work of the Armouries' registrar staff. The transformed legal status of handguns has not translated directly to museum specimens, as certain firearms controls do not apply to any institution with the proper licensing arrangements. Even allowing for these tailored exemptions, licensed museums are still required to implement more stringent safeguards for Section 5 'prohibited firearms' than other classes of firearm.<sup>131</sup> In theory then, the legal reclassification of handguns

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<sup>127</sup> Jen Kaines, Head of Collection Services - Royal Armouries (1), interviewed by Stuart Bowes, 29 November 2021, p. 17.

<sup>128</sup> Wilson, Yardley, and Pemberton, p. 55.

<sup>129</sup> Thomson, Stancich, and Dickson, pp. 336-40.

<sup>130</sup> *Firearms Act 1968*, c. 27 (London: HMSO), pp. 1-4; *Firearms (Amendment) Act 1997*, c. 5 (London: The Stationery Office), p. 1; *Firearms (Amendment) (No. 2) Act 1997*, c. 64 (London: The Stationery Office), p. 1.

<sup>131</sup> Home Office, *Firearms Security Handbook*, p. 19.



should have had major consequences for their use and management within a museum context. However, it had less of an impact than might be expected at the Armouries. Its registrar staff already oversaw a robust institutional strategy to manage existing collections of Section 5 firearms as required by its license terms – access restrictions, stringent security systems, and robust storage – so they did not need to change much to comply with the new controls.<sup>132</sup> The immediate impact of stronger handgun regulations was relatively minor for the Armouries. Nor have these provisions affected the development of the National Firearms Centre (NFC) to any great extent, the most secure site operated by the Armouries that holds its modern firearms collections. Many of the prohibited handguns were transferred there following its relocation in 2005, but this was primarily due to the superior storage facilities provided by the NFC rather than any reflection of the new legal status of these firearms.<sup>133</sup> Again, the specific regulation of handguns has been subsumed into the wider strategies formulated by the Armouries to fulfil its responsibilities under weapons law. For all the apparent severity of the 1997 Acts, the exemptions available to museums combined with the Armouries' established practices mean these legal developments have largely left the management of its prohibited firearms untouched.

The direct impact of the handgun controls stipulated by the *Firearms (Amendment) Acts* of 1997 may have been relatively modest for the Armouries, but their long-term consequences have carried greater weight. Following the enactment of this legislation, the Home Office organised an amnesty to encourage private individuals to relinquish prohibited handguns and remove them from circulation. Between July 1997 and February 1998, around 162,000 handguns and 700 tonnes of ammunition were surrendered to police forces across Great Britain.<sup>134</sup> Although the majority of these items were destroyed, it was recognised that the most unique historical examples should be preserved on account of their cultural value. As such, a small proportion were eventually transferred to a selection of museums in order to enrich their collections. It is difficult to calculate precisely how many of these handguns entered the Armouries' possession as a result, but internal records suggest a figure in the thousands.<sup>135</sup>

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<sup>132</sup> Laura Bell, Director of Collections - Royal Armouries (1), interviewed by Stuart Bowes, 29 November 2021, p. 13.

<sup>133</sup> Kaines, interview, 29 November 2021, pp. 21-22.

<sup>134</sup> Home Office, *Handgun Surrender and Compensation* (London: National Audit Office, 1999), p. 3.

<sup>135</sup> Royal Armouries, 'No.1 Buy-In Multiple Acquisition Proposal Form' (unpublished internal document, 2018), p. 2.

Processing this inundation of objects has been a vast undertaking. Every item must be accessioned, inspected, documented, photographed, researched, measured, transported, and stored, requiring hours of careful work in each case. When scaled up to such a substantial collection and coupled with the relevant legal restrictions, the enormity of the task is evident. The Armouries has thus devoted considerable resources and effort to clearing this backlog ever since, making steady progress in this endeavour.<sup>136</sup> Ensuring institutional compliance with any aspect of weapons law is not a trivial process that should be rushed. The potential consequences of violation are too grave for its staff to even contemplate. As a result of the mandated handgun amnesty then, the ramifications of the 1997 Acts have long occupied the attentions of the Armouries' personnel. This legislation has ultimately continued to dictate the stewardship of handguns decades after its introduction, even if in a more circuitous fashion than might be expected.

This case study reveals a number of key insights into the regulation of museum weapons collections. Firstly, museums have much greater legal freedom than private individuals. As the control of handguns has demonstrated, the fact that the Armouries can acquire and possess these firearms at all sets it apart from the general public. The cultural engagement with these otherwise prohibited objects facilitated by museums is perceived as being important enough to justify this exemption, albeit subject to stringent regulation. This unique legislative situation can have unpredictable effects on museum operations, often impinging on their development in ways that 'were not in the mind of the legislators'.<sup>137</sup> The impact of the *Firearms (Amendment) Acts* on the Armouries, for example, has been less the direct result of their strengthened handgun restrictions than the influx of these newly prohibited firearms into its custody following the subsequent amnesty. The Armouries' registrar staff must be keenly attentive to the law's many intricacies, lest they overlook a significant detail that applies to its objects. This uncertainty stems from the reality that museum needs are rarely a high priority during the formulation of weapons legislation. The 1997 Acts were ultimately a response to the Dunblane Massacre that sought to prevent future tragedies of similar magnitude by removing the offending weapons from general circulation.<sup>138</sup> The concerns of museums were incidental to this overriding objective. This example conveys the contingent nature of the legislative context in which museums operate, since weapons law has often been

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<sup>136</sup> Bell, interview, 29 November 2021, p. 15.

<sup>137</sup> Selwood and Davies, p. 45.

<sup>138</sup> Thomson, Stancich, and Dickson, p. 329.

strengthened in response to contemporary developments. A statute introduced at a particular historical moment can remain in force for generations, continuing to regulate behaviour in times far removed from the context of its creation.<sup>139</sup> The Armouries' registrar staff must negotiate these aging and proliferating frameworks to maintain institutional compliance with its legal responsibilities. In order to fulfil these complex demands, they have cultivated a comprehensive understanding of the relevant controls and proactively seek to anticipate the introduction of new provisions. The 1997 Acts had relatively little impact on the Armouries' management of handguns because the necessary safeguards were already in place for its other prohibited firearms. Thorough preparation is thus essential to the consistent observance of these legal obligations.<sup>140</sup> Fundamentally, the example of the *Firearms (Amendment) Acts* of 1997 underscores the uneasy relationship between weapons law and museum practice that pervades the work of the Armouries. It speaks to many of the themes articulated in the opening quotation of this chapter: the cursory recognition of museums in weapons law, the historical contingency of individual statutes, and the need for close scrutiny of their contents. Given the enormity and complexity of the pervading legal edifice, these concerns are hardly unique to the Armouries' collections of handguns.

### **'Collections Which Are Essentially Restricted by Law'**

As the ongoing institutional repercussions of the *Firearms (Amendment) Acts* of 1997 exemplify, management of the Armouries' weapons collections is heavily determined by parliamentary legislation. As the national museum of arms and armour, it possesses thousands of objects that could pose a threat both to individuals and society at large if stringent safeguarding procedures are not enacted.<sup>141</sup> After all, many items within its extensive weapons collections were purposefully devised to inflict harm. In order to mitigate the potential dangers of maintaining such a substantial concentration of high-risk objects, the Armouries abides by the provisions of English weapons law – Scotland and Northern Ireland are subject to distinct legislative traditions as a result of their devolved administrations. The Armouries affirms its rigid adherence to this body of law

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<sup>139</sup> Clive Gray, *The Politics of Museums* (Basingstoke: Palgrave Macmillan, 2015), pp. 167-68.

<sup>140</sup> Sally Yerkovich, 'Ethics for Registrars and Collections Managers', in *MRM6: Museum Registration Methods*, ed. by John E. Simmons and Toni M. Kiser, 6th edn (Lanham: Rowman & Littlefield, 2020), pp. 446-55 (pp. 446-47).

<sup>141</sup> Bell, interview, 29 November 2021, p. 10.

in its Collections Policy Framework, acknowledging the importance of fulfilling its legal obligations ‘in the course of preserving the national collection of arms and armour’.<sup>142</sup> The contravention of just one clause could jeopardise its entire existence, tarnishing its institutional reputation and endangering the future of its collections. It is thus essential that the Armouries’ registrar staff work to ensure that its collections management strategies invariably comply with the relevant legal provisions. However, this is no easy task. Its current Collections Access Policy outlines some of the statutes that regulate the possession and use of museum weapons collections: the *Firearms Act 1968*, the *Knives Act 1997*, the *Explosives Act 1875*, the *Explosives Regulations 2014*, the *Offensive Weapons Act 2019*, the *Violent Crime Reduction Act 2006*, and their subsequent amendments.<sup>143</sup> This list is a useful starting point for investigating the legislative context in which the Armouries operates, but it still only encompasses a proportion of the relevant legislation. The *Firearms (Amendment) Acts* of 1997 discussed earlier, for example, are not explicitly mentioned.<sup>144</sup> Overall, there are at least 30 major statutes spanning nearly 150 years that currently regulate the possession, use, or transfer of weapons in some capacity (see the Appendix). If this thesis is to effectively address the challenges of facilitating access to these restricted collections, it must first present a coherent summary of the elaborate legal framework that shapes these interactions and its specific provisions for museums.

England currently enforces one of the most substantial bodies of weapons legislation in the world. This regulatory framework consists of three distinct legal traditions that apply to different categories of weaponry – by chance, these correspond to the first three Acts cited by the Armouries’ Collections Access Policy – firearms law, offensive weapons law, and explosives law. As each legislative corpus has developed almost entirely in isolation from the others (again, see the Appendix), this study works through their respective controls on the Armouries’ collections in turn. The divergence of these legal traditions has resulted from their mitigation of the specific dangers posed by these different object types. Individual pieces of legislation have often been enacted in response to historically contingent events and debates that have arisen from their use (or misuse).<sup>145</sup> These influences can still be discerned in current legal frameworks. If

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<sup>142</sup> Royal Armouries, *Collections Policy Framework*, p. 3.

<sup>143</sup> Royal Armouries, *Collections Access Policy*, p. 2.

<sup>144</sup> *Firearms (Amendment) Act 1997; Firearms (Amendment) (No. 2) Act 1997*.

<sup>145</sup> Hurka, pp. 4-5.

this study is to effectively grasp the complex legal status of the Armouries' collections, it must situate these different strands of weapons law within their historical context. As if the legislation itself is not already complicated enough, there is also the matter of its interpretation. Even where the letter of the law remains constant, the shifting priorities of enforcing authorities can profoundly influence how the relevant legislation is applied to museum practice.<sup>146</sup> The maintenance of weapons collections is thus bound by an expansive legal apparatus, requiring the Armouries' registrar staff to expend great effort to comply with its terms. It is not the place of this thesis to conduct an exhaustive summary of every clause of weapons law, as such an endeavour is well beyond the scope of a doctoral thesis. Instead, it focuses on the restrictions that directly affect the Armouries' ability to provide access to the weapons under its charge. After all, these are the clauses its registrar staff have to master if they are to ensure constant legal compliance during the management, exhibition, and use of its collections. This is a challenging task, one exacerbated by the 'cluttered and confusing' state of weapons law that makes it 'all too easy for legal practitioners and commentators to fall into error'.<sup>147</sup> The same clearly applies to museum registrars. The possibility of overlooking a crucial detail is always a risk when there are no comprehensive guides for applying the provisions of weapons law to contemporary museum practice. As such, this chapter as a whole seeks to provide an intelligible synopsis of the current legislative landscape. This groundwork determines the true scale of the constraints encountered by the Armouries' registrar staff in their efforts to facilitate greater access to its weapons collections.

### **Offensive Weapons Law**

The first of the major legal traditions that constitute English weapons law targets offensive weapons. This legislative corpus originated with the *Prevention of Crime Act 1953*, whose full title reads: 'An Act to prohibit the carrying of offensive weapons in public places without lawful authority or reasonable excuse.'<sup>148</sup> This statement conveys the basic object of offensive weapons law, reducing the potential risk of such weapons to society at large. Contemporary observers appear to have understood the 1953 Act as an attempt to reverse a perceived rise in criminal violence following the Second World

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<sup>146</sup> Bell, interview, 29 November 2021, p. 15.

<sup>147</sup> Fortson, p. 128.

<sup>148</sup> *Prevention of Crime Act 1953*, 1&2 Eliz.2, c. 14 (London: HMSO), p. 1.

War.<sup>149</sup> Seventy years later, the purpose of offensive weapons law remains much the same. A key component of the UK Government's recent 'Serious Violence Strategy' has been the introduction of 'further measures on offensive and dangerous weapons' in response to increases in violent crime.<sup>150</sup> Legislation to regulate the acquisition and possession of offensive weapons has thus long been viewed as an effective means of limiting the perpetration of serious violence. While it is not the aim of this thesis to evaluate the effectiveness of these initiatives, this guiding purpose strongly influences the operation of offensive weapons law. But what actually distinguishes an offensive weapon from other forms of weapon? One might assume that all weapons could be classed as offensive, but under English law the term 'offensive weapon' has a particular application. The 1953 Act adopts the following phrasing: 'any article made or adapted for use for causing injury to the person, or intended by the person having it with him for such use.'<sup>151</sup> For legal purposes, offensive weapons thus range from military-issue equipment down to a small penknife in certain circumstances. Firearms are explicitly excluded from this formulation, however, as they are subject to their own body of legislation.<sup>152</sup> In practice then, offensive weapons primarily encompass melee weapons and projectile weapons that lie outside the definition of firearms (namely those without barrels). The scope of this legal designation becomes evident when mapped onto the Armouries' collections. Staff weapons (Class VII), maces, hammers, and axes (Class VIII), swords (Class IX), daggers, knives, and bayonets (Classes X and XXII), and bows and crossbows (Class XI) all fall within the remit of offensive weapons law. These objects comprise around 30 percent of the Armouries' holdings – roughly 22,000 items in total – according to a recent internal evaluation.<sup>153</sup> Any unauthorised appropriation of these collections could be calamitous for public safety. If the strategies adopted by the Armouries' registrar staff to mitigate this serious risk are to be ascertained, it is first necessary to explore the intricacies of offensive weapons law.

Two main approaches can be discerned in offensive weapons law to reduce public exposure to these potentially dangerous articles: general prohibition and targeted restriction. The *Prevention of Crime Act 1953* is an example of the former. Subsection

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<sup>149</sup> John Ll. J. Edwards, 'Prevention of Crime Act, 1953', *Modern Law Review*, 16 (1953), 482-84 (p. 482).

<sup>150</sup> HM Government, *Serious Violence Strategy* (London: The Stationery Office, 2018), p. 7.

<sup>151</sup> *Prevention of Crime Act 1953*, p. 2.

<sup>152</sup> *Criminal Justice Act 1988*, c. 33 (London: HMSO), p. 95.

<sup>153</sup> Royal Armouries, 'Collections Strategy 2019-2024' (unpublished internal document, 2019), p. 12.

1(1) of this Act states: ‘Any person who without lawful authority or reasonable excuse [...] has with him in any public place any offensive weapon shall be guilty of an offence.’<sup>154</sup> The breadth of this formulation means it could apply to anyone, even an individual in momentary possession of such a weapon. This would conceivably include both staff and visitors participating in the Armouries’ routine programming. The general prohibition on carrying offensive weapons in public is further supplemented by the *Criminal Justice Act 1988*. Section 139 stipulates that it is unlawful to carry a bladed or sharply pointed article in public, except a folding pocketknife with a blade under three inches long.<sup>155</sup> Given that this Section’s language is almost identical to that of the 1953 Act, it further refines the types of items that constitute an offensive weapon. Identifying the objects in the Armouries’ collections that are banned in public is thus quite a straightforward (if time-consuming) exercise. However, determining what actually constitutes a public place across its institutional sites is more difficult. The definitions of ‘public place’ adopted by the 1953 and 1988 Acts are essentially identical: ‘any place to which at the material time the public have or are permitted access, whether on payment or otherwise.’<sup>156</sup> According to this provision, the Armouries’ gallery spaces constitute a public place, at least during opening hours. But what of other areas – stores, archives, workshops, and offices – whose status is more ambiguous? One line of thinking posits that they would still be considered public spaces under this legislation, as public access is possible if heavily restricted for the most part.<sup>157</sup> In the absence of further clarification, this matter cannot be resolved definitively. In any case, this debate has less bearing on the Armouries’ operations than is first apparent. Both the 1953 and 1988 Acts contain exemptions for certain circumstances where offensive weapons are possessed in public for legitimate purposes – expressed as ‘reasonable excuse’ and ‘good reason’, respectively.<sup>158</sup> These formulations are open to interpretation, but a staff member or a visitor possessing an offensive weapon on a museum site in the course of public programming seems a sound defence. Museums are not covered by these particular provisions on the grounds of their cultural role. The Armouries is thus effectively exempt from the general prohibition of possessing offensive weapons in public, as long as its work is perceived to warrant this special dispensation.

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<sup>154</sup> *Prevention of Crime Act 1953*, p. 1.

<sup>155</sup> *Criminal Justice Act 1988*, p. 94.

<sup>156</sup> *Prevention of Crime Act 1953*, p. 2; *Criminal Justice Act 1988*, p. 95.

<sup>157</sup> Bell, interview, 29 November 2021, p. 4.

<sup>158</sup> *Prevention of Crime Act 1953*, p. 1; *Criminal Justice Act 1988*, p. 94.



**Figure 2: Flick Knife, X.1600**

Royal Armouries, 'Knife (1980-1990)' <<https://collections.royalarmouries.org/object/rac-object-34761.html>> [accessed 11 November 2021].



**Figure 3: Gravity Knife, X.1561**

Royal Armouries, 'Knife - Gravity Knife (1939-1944)' <<https://collections.royalarmouries.org/object/rac-object-21139.html>> [accessed 4 February 2022].

Alongside the general restriction of offensive weapons in public spaces, there have been efforts to further regulate specific articles that are considered to be especially dangerous. This approach was initiated by the *Restriction of Offensive Weapons Act 1959*, which complemented the broad focus of the *Prevention of Crime Act 1953* by placing specific constraints on flick knives and gravity knives. In its current form, the 1959 Act makes it illegal for anyone in England to manufacture, sell, hire, offer for sale or hire, possess for sale or hire, lend, or give to another person these particular items.<sup>159</sup> As the Armouries possesses examples of both types of knives (Figures 2 and 3), its registrar staff must be aware of the substantial restrictions that ordinarily apply to them. The provisions of the 1959 Act were also augmented later by the *Criminal Justice Act 1988*. Section 141 of the 1988 Act authorised the creation of statutory instruments to prohibit the production or transfer of any designated offensive weapon under the same terms as the 1959 Act outlined above.<sup>160</sup> The *Criminal Justice Act 1988 (Offensive Weapons) Order 1988* duly specified the weapons in question (excepting those over 100

<sup>159</sup> *Restriction of Offensive Weapons Act 1959*, 7&8 Eliz.2, c. 37 (London: HMSO), p. 1; *Restriction of Offensive Weapons Act 1961*, 9&10 Eliz.2, c. 22 (London: HMSO), p. 1.

<sup>160</sup> *Criminal Justice Act 1988*, p. 95.



years old): knuckledusters, swordsticks, belt buckle knives, push daggers, butterfly knives, telescopic truncheons, blowpipes, and an array of martial arts weapons.<sup>161</sup> One of the advantages of this arrangement is that extending the restrictions enacted by Section 141 of the 1988 Act does not require major legislative change. It has thus been possible to promptly regulate new categories of offensive weapons when the need has arisen: disguised knives in 2002, stealth knives and regular truncheons in 2004, longer curved swords in 2008, zombie knives in 2016, and cyclone knives in 2019 (see the Appendix). These will likely be joined by machetes and large outdoor knives in the near future following a recent government consultation.<sup>162</sup> These designated objects only constitute a fraction of the Armouries' collections, but the controls on their movement and transfer could be seriously disruptive. A prohibition on lending these objects would cause particular difficulties for its registrar staff, as those responsible for arranging this key form of collections access. This is exacerbated for international loans by further prohibitions on importing these select offensive weapons, as both the 1959 Act and Section 141 of the 1988 Act contain clauses to this effect.<sup>163</sup> Importing, lending, disposing, or otherwise transferring these specific categories of offensive weapons would thus all be illegal under normal circumstances. Unaltered, these provisions would severely hamper public access to the relevant parts of the Armouries' collections.

It is fortuitous then that this body of legislation does contain a number of exemptions for museums. Unlike their presumed immunity from the general prohibition of possessing offensive weapons in public, these defences explicitly mention museums. Legislators first considered their specific needs under offensive weapons law in the *Criminal Justice Act 1988*. Subsection 141(8) permitted the manufacture, sale, hire, offer for sale or hire, possession for sale or hire, lending, giving, or import of any weapon regulated under Section 141 to make it 'available to a museum or gallery', while Subsection 141(9) authorised anyone 'acting on behalf of a museum or gallery' to hire or lend such a weapon for cultural, artistic, or educational purposes.<sup>164</sup> As such, the Armouries' acquisition and use of objects specified by the *Criminal Justice Act 1988 (Offensive Weapons) Order 1988* and its subsequent amendments – from knuckledusters

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<sup>161</sup> *The Criminal Justice Act 1988 (Offensive Weapons) Order 1988*, SI 1988/2019 (London: HMSO).

<sup>162</sup> Home Office, *Consultation on New Knife Legislation Proposals to Tackle the Use of Machetes and Other Bladed Articles in Crime* (London: Home Office, 2023), pp. 2, 27-29.

<sup>163</sup> *Restriction of Offensive Weapons Act 1959*, p. 1; *Customs and Excise Management Act 1979*, c. 2 (London: HMSO), p. 34; *Criminal Justice Act 1988*, p. 96.

<sup>164</sup> *Criminal Justice Act 1988*, pp. 96-97.

to cyclone knives – has always been possible. As this exemption was introduced alongside the relevant restrictions, museums were immune from the moment of its implementation. However, this did not happen with the weapons regulated by the *Restriction of Offensive Weapons Act 1959*. Sixty years elapsed before an exemption for museums from its controls on flick knives and gravity knives was finally implemented by the *Offensive Weapons Act 2019*. Subsection 44(4) amended the 1959 Act to exempt museum personnel from the regulation of these knives on the same terms as Subsections 141(8-9) of the 1988 Act outlined above.<sup>165</sup> It would have technically been illegal for the Armouries to loan a gravity knife or a flick knife to another institution before this point, despite being able to lend most other restricted offensive weapons. This is a prime example of the need for the Armouries' registrar staff to closely read the letter of the law, especially in complex cases.<sup>166</sup> Legislation is still binding even if it is flawed. In this case, the historical fragmentation of offensive weapons law appears to have engendered the anomaly. Contemporary parliamentary proceedings suggest that lawmakers overlooked the need to retroactively extend the museum exemptions formulated for the 1988 Act to gravity knives and flick knives as well, even though the 1959 Act was explicitly discussed during these debates.<sup>167</sup> This oversight was only rectified three decades later, although it hardly seems to have affected the Armouries' operations in the intervening years. Perhaps most significantly, it conveys a recurrent theme in the development of weapons law: the belated recognition of museum needs.

If museums are exempt from the prevailing restrictions on the transfer of certain offensive weapons, then it surely follows that the same applies to their possession. The ownership of these objects was not regulated until the last few years, when offensive weapons law was expanded into the private sphere for the first time. Sections 44 and 46 of the *Offensive Weapons Act 2019* made it illegal to even possess any of the weapons subject to the 1959 Act or Section 141 of the 1988 Act.<sup>168</sup> While the primary target of these provisions was private ownership, they would have also made museum possession of these newly unlawful objects impossible – precluding any further intervention. Disposal of the offending collections would have been the only legitimate course of

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<sup>165</sup> *Offensive Weapons Act 2019*, c. 17 (London: The Stationery Office), p. 39.

<sup>166</sup> Jill McKnight, Assistant Registrar - Royal Armouries, interviewed by Stuart Bowes, 22 February 2023, p. 7.

<sup>167</sup> House of Lords, *Hansard's Parliamentary Debates: The Official Report* (14 November 1988, vol. 501, cols. 855-60) (London: Hansard).

<sup>168</sup> *Offensive Weapons Act 2019*, pp. 38, 41.

action, as is standard practice when a museum can no longer meet the legal conditions of a particular item.<sup>169</sup> Not only would this have compromised its role as the custodian of the national collection of arms and armour, but the need for appropriate disposal arrangements would also have created considerable work for its registrar staff (see Figure 1). Legal changes have operational consequences, as with the handgun ban and amnesty outlined in the opening section. It is fortuitous then that the 2019 Act also gave museums explicit immunity from these new prohibitions. It thus remains legal for individuals to possess any weapon listed by either the 1959 Act or the amended 1988 Order ‘in their capacity as the operator of, or as a person acting on behalf of, a museum or gallery’.<sup>170</sup> This clause is certainly important for the Armouries’ routine operations, as it serves to exempt its institutional holdings from all controls pertaining to these high-risk offensive weapons at present. Coupled with the museum defences for public possession, this provision essentially assures the continued integrity of the Armouries’ offensive weapons collections. Indeed, its registrar staff generally consider their immediate risk to personal safety to be a greater concern than any legislative stipulation.<sup>171</sup> Nonetheless, the Armouries cannot become complacent about its privileged legal status. There is always the possibility, however slim, that its immunity may be altered or revoked in a future statute. Its registrar staff must therefore follow any relevant legislative developments closely and be prepared to act accordingly.

At this stage, it would appear that no aspects of offensive weapons law actually apply to the Armouries’ collections. This is not entirely true. Crossbows are absent from the main body of offensive weapons law, as they are regulated separately under the *Crossbows Act 1987*. Its main provision relating to museum practice is the prohibition of anyone under the age of eighteen from possessing a working crossbow with a draw weight of over 1.4 kilograms (or its constituent components), without supervision by someone older than twenty-one.<sup>172</sup> Although this specific situation cannot be common in a museum context, this does not make this provision any less binding. The 1987 Act does not include an exemption for museums, so it falls to the Armouries’ registrar staff to ensure its terms are observed in relation to its crossbow holdings. The *Crossbows Act*

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<sup>169</sup> Antonia Moser, 'Deaccessioning and Disposal', in *MRM6: Museum Registration Methods*, ed. by John E. Simmons and Toni M. Kiser, 6th edn (Lanham: Rowman & Littlefield, 2020), pp. 118-25 (p. 120).

<sup>170</sup> *Offensive Weapons Act 2019*, pp. 39, 43.

<sup>171</sup> Kaines, interview, 29 November 2021, pp. 5-6.

<sup>172</sup> *Crossbows Act 1987*, c. 32 (London: HMSO), pp. 1-2; *Violent Crime Reduction Act 2006*, c. 38 (London: The Stationery Office), pp. 44-45.

1987 is not the only standalone measure in this area that the Armouries must consider, the same is true of the *Knives Act 1997*. This statute takes a different approach to the control of offensive weapons. Instead of restricting the objects themselves, it targets the materials publicising them. The 1997 Act made it an offence to market knives – defined as a bladed or sharply pointed instrument – in a way that suggests their suitability for combat or encourages their violent use.<sup>173</sup> While this measure seeks to regulate the general sale of knives, its breadth could also unintentionally constrain the work of museums that hold such objects. Its application hinges on the definition of ‘marketing’, which comprises selling or hiring a knife, offering one for sale or hire, possessing one for sale or hire, and publishing material to support the sale or hire of one.<sup>174</sup> Thus, the 1997 Act does not affect the offensive weapons collections held by the Armouries, which are not commodities, but it does apply to replicas sold in its gift shop. Its retail department follows procedures for age verification and merchandising, developed in concert with its registrar staff, to ensure operational adherence to the terms of offensive weapons law.<sup>175</sup> This case highlights the importance of the cultivation of legal expertise by collection professionals, especially in relation to weapons. The fact that the 1997 Act only controls marketing publications around knives could easily be overlooked, giving the mistaken impression that any material published by museums on knives – such as research or social media posts – could breach its terms. It is thus vital that the Armouries’ registrar staff maintain an extensive working knowledge of offensive weapons law, even though its collections are largely exempt. It is far better to take on the added burden of mastering its provisions than to risk the serious consequences of accidental violation. Caution ultimately has to prevail.

## **Firearms Law**

If offensive weapons legislation appears elaborate, then the dispersed provisions of firearms law attain another level of complexity. Firearms regulation is a controversial issue in many modern societies including the UK, often inciting polarised debate when new controls are proposed. On one side is a pro-gun lobby that seeks to limit restrictions on the use of firearms for recreational or occupational purposes, which is invariably

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<sup>173</sup> *Knives Act 1997*, c. 21 (London: The Stationery Office), pp. 1, 7.

<sup>174</sup> *Knives Act 1997*, pp. 1-2.

<sup>175</sup> Royal Armouries, ‘Terms of Service’ <<https://shop.royalarmouries.org/policies/terms-of-service>> [accessed 28 April 2022]; Bell, interview, 29 November 2021, pp. 2-3.

ranged against an anti-gun lobby that supports firearms regulation as a means of combatting their threat to both individuals and society at large.<sup>176</sup> This friction has profoundly shaped the national development of firearms law. In order to accommodate these competing interests, legislators have sought to effectively neutralise the danger of firearms to public safety without overly restricting their legitimate possession or use.<sup>177</sup> The Armouries treads this fine line every time it displays, distributes, or demonstrates a firearm during its public programming. As with offensive weapons law, this legislative apparatus has evolved to meet changing requirements. Advances in the power, accuracy, firing rate, and production of firearms have only increased their potential threat to society. In response, firearms law has been periodically updated to account for these technological developments as well as broader shifts in public attitude. However, this piecemeal accumulation has produced a sprawling legal corpus. A 2015 report on firearms law found that its controls were spread across 34 different statutes, a figure that has only increased in the intervening years.<sup>178</sup> This legislative proliferation hardly expedites the implementation of its provisions. The basic act of establishing what actually constitutes a firearm for legal purposes is challenging in this context. The current definition of firearms is expressed by the *Policing and Crime Act 2017*: a ‘lethal barrelled weapon’ that discharges missiles with kinetic muzzle energy over one joule; a ‘prohibited weapon’ (a category that will be explored further); a ‘relevant component’ of a lethal barrelled or prohibited weapon; or an ‘accessory’ designed to diminish the noise or flash of a lethal barrelled or prohibited weapon.<sup>179</sup> The legal meaning of firearms is thus expansive, not only covering ‘lethal barrelled’ and ‘prohibited’ articles but also their constituent parts. Due to this broad scope, large swathes of the Armouries’ collections are controlled by firearms law. According to a recent internal estimate, it holds around 26,000 firearms, one of the largest museum collections of its type.<sup>180</sup> Given the scale of these holdings, it is imperative that the Armouries closely observes firearms law in the interests of public safety. However, comprehensiveness does not equate to uniformity. Different types of firearms are subject to graduated levels of

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<sup>176</sup> Stuart Smith, ‘Theorising Gun Control: The Development of Regulation and Shooting Sports in Britain’, *The Sociological Review*, 54 (2006), 717-33 (p. 718).

<sup>177</sup> Home Office, *Firearms Licensing: A Consultation on Recommendations for Changes Made to the Home Office* (London: Home Office, 2023), p. 3.

<sup>178</sup> Law Commission, *Firearms Law – Reforms to Address Pressing Problems* (London: The Stationery Office, 2015), pp. 1-2.

<sup>179</sup> *Policing and Crime Act 2017*, c. 3 (London: The Stationery Office), p. 142.

<sup>180</sup> Royal Armouries, ‘Collections Strategy 2019-2024’, p. 10.

control corresponding to their perceived threat to society. The resulting variation has profound ramifications for the management and use of museum firearms collections. It is primarily the responsibility of the Armouries' registrar staff to clarify the messy intersection of firearms legislation and operational practice.

The foundation of English firearms law is the *Firearms Act 1968*. Designed as a consolidating measure, it brought together all the firearms legislation introduced during the first half of the twentieth century.<sup>181</sup> The 1968 Act was comprehensive in its intent. It covered a wide range of subjects: restrictions on firearms and ammunition, firearms offences, firearms certificates, firearms dealers, police enforcement, sentencing, and relevant exemptions.<sup>182</sup> The majority of these provisions remain in force today, albeit often modified in their details. Among its many clauses, the 1968 Act specifies certain individuals who are forbidden from possessing firearms at all. Museums are affected by these measures insofar as they cannot transfer (construed as to 'let on hire, give, lend and part with possession') their firearms to any prohibited person.<sup>183</sup> The 1968 Act applies this blanket ban to a few notable groups. The first of these is 'persons previously convicted of crime'. Under Section 21, it is unlawful to transfer firearms or ammunition to persons imprisoned for three to thirty-six months within five years of their release, while individuals who have served a custodial sentence of three years or more cannot ever be given them.<sup>184</sup> Section 24 then regulates the supply of firearms to minors, making it an offence to 'part with the possession' of a licensed weapon or ammunition to a person under the age of fourteen.<sup>185</sup> Finally, Section 25 forbids the transfer of any firearm or ammunition to someone believed to be 'drunk or of unsound mind'.<sup>186</sup> Few would dispute the safety rationale behind these prohibitions, but they do markedly constrain access to museum firearms collections. During the 2021-22 financial year, for example, children under sixteen comprised over 20 percent of the Armouries' total visitors.<sup>187</sup> Although these statistics do not give a specific figure for under 14s, they are a key demographic by any measure. Given that they represent just one of the prohibited groups, the 1968 Act bars outright a sizable proportion of the Armouries' audience from

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<sup>181</sup> Law Commission, p. 2.

<sup>182</sup> Colin Greenwood, *Firearms Control: A Study of Armed Crime and Firearms Control in England and Wales* (London: Routledge and Kegan Paul, 1972), pp. 183-84.

<sup>183</sup> *Firearms Act 1968*, p. 30.

<sup>184</sup> Hill, pp. 50-51.

<sup>185</sup> *Firearms Act 1968*, p. 12.

<sup>186</sup> *Firearms Act 1968*, p. 12.

<sup>187</sup> Board of Trustees of the Royal Armouries, *Annual Report and Accounts 2021-22*, p. 13.

directly interacting with its firearms holdings. Few other object types in museums are subject to such absolute restrictions on public engagement. Yet, it is a reality that the Armouries' registrar staff must accommodate in the course of their routine practice. At minimum, it requires them to develop thorough processes to screen everyone that may come into contact with its firearms collections – staff, contractor, or visitor.<sup>188</sup> While this additional step does complicate the provision of collections access, it is essential to meeting the Armouries' regulatory obligations. The law always takes precedence.

Beyond these blanket prohibitions, the provisions of the *Firearms Act 1968* are primarily determined by the nature of the objects themselves – similar to offensive weapons law. It inaugurated a core feature of contemporary firearms law: different grades of regulation proportionate to the perceived danger of individual firearms. Their material diversity demands such an approach, as the risk posed by a fourteenth-century hand cannon differs dramatically from that of a twenty-first-century assault rifle.<sup>189</sup> Despite them both fitting the definition of a firearm, their substantial differences in power, firing rate, accuracy, ease of use, and availability of ammunition require very different levels of control. To account for this heterogeneity, the 1968 Act allocated all firearms and ammunition to four categories of varying severity. The default state under Section 1 is that a firearms certificate is required to possess firearms or ammunition, unless an object is specifically addressed by another section.<sup>190</sup> Similarly, Section 2 of the 1968 Act made it an offence to possess certain shotguns without holding a shotgun certificate, which entails a simpler licensing process than its Section 1 equivalent.<sup>191</sup> Section 5 articulates the strongest category of regulation, which surpasses Section 1 in stipulating certain firearms and ammunition that are illegal to possess without express ministerial authority. These are the 'prohibited weapons' cited earlier in the definition of firearms. When the 1968 Act passed, only three forms of weapon were prohibited under Section 5 – automatic firearms, weapons discharging noxious substances, and noxious ammunition – but this list has since grown substantially.<sup>192</sup> This class of restrictions appears frequently during this thesis, so the relevant articles are henceforth referred to as 'Section 5 firearms' for brevity. Finally, certain firearms were exempted

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<sup>188</sup> Bell, interview, 29 November 2021, p. 4; Katie Robson, Registrar - Royal Armouries (1), interviewed by Stuart Bowes, 1 April 2022, p. 3.

<sup>189</sup> Tucker and others, pp. 725-26.

<sup>190</sup> *Firearms Act 1968*, pp. 1-2.

<sup>191</sup> Greenwood, pp. 189-90.

<sup>192</sup> *Firearms Act 1968*, p. 4; *Anti-social Behaviour, Crime and Policing Act 2014*, c. 12 (London: The Stationery Office), pp. 76-77.

from all three of these Sections of the 1968 Act – namely ornamental ‘antiques’ and air weapons not considered to be ‘specially dangerous’ – whose possession is not regulated at all.<sup>193</sup> While many individual weapons have subsequently been transferred between these legal categories, this fundamental sectioning apparatus has endured to this day. Yet, despite its elaborate regulatory structure, the 1968 Act made no specific provisions for museum collections. The exemption of ‘antique’ firearms possessed as ‘a curiosity or ornament’ from its provisions was the nearest it came to considering their unique concerns.<sup>194</sup> The existence of the NFC alone demonstrates that not all firearms in museums are antiques. Two decades elapsed before museums were directly addressed.

The *Firearms Act 1968* may be the basis of English firearms law, but the next major piece of legislation, the *Firearms (Amendment) Act 1988*, is just as significant for museums. The Schedule of the 1988 Act introduced the Museum Firearms Licence, the first legal mechanism tailored to the needs of firearms management in museums.<sup>195</sup> This Licence, with a few minor adjustments, has remained the primary framework governing museum ownership and use of firearms ever since. The Armouries’ current institutional policy exemplifies its continued jurisdiction, affirming its status as a ‘Museum Firearms Licence holder’ in no uncertain terms.<sup>196</sup> The longevity of this licensing arrangement – three and a half decades so far – suggests that its provisions have achieved a measure of operational success. The terms of the Licence itself are central to understanding its impact on museum practice, so it is worth reproducing them in full:

While a museum firearms licence [...] is in force in respect of a museum the persons responsible for its management and their servants—

- (a) may, without holding a firearm certificate or shot gun certificate, have in their possession, and purchase or acquire, for the purposes of the museum firearms and ammunition which are or are to be normally exhibited or kept on its premises or on such of them as are specified in the licence; and
- (b) if the licence so provides, may, without the authority of the Secretary of State under section 5 of the principal Act, have in their possession, purchase or acquire for those purposes any prohibited weapons and ammunition which are or are to be normally exhibited or kept as aforesaid.<sup>197</sup>

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<sup>193</sup> Hill, pp. 31, 37.

<sup>194</sup> *Firearms Act 1968*, p. 31.

<sup>195</sup> *Firearms (Amendment) Act 1988*, c. 45 (London: HMSO), pp. 16-18.

<sup>196</sup> Royal Armouries, *Collections Information Policy* (Leeds: Royal Armouries, 2019), p. 2.

<sup>197</sup> *Firearms (Amendment) Act 1988*, p. 16.



Simply put, institutional procurement of this Licence exempts a museum and its staff from offences related to the purchase, acquisition, and possession of all firearms and ammunition that are kept on its premises. It essentially makes the routine management of these objects by the Armouries' registrar staff possible. There are few clauses across the whole body of weapons law that match its significance within a museum context. Without this sweeping provision, the Armouries simply could not maintain its extensive and diverse collection of firearms. The Museum Firearms Licence guarantees its ability to function as the national museum of arms and armour.

As might be expected with such high-risk objects as firearms, however, the immunity provided by the Museum Firearms Licence is subject to a number of stringent conditions. Subparagraph 1(3) of the Schedule to the 1988 Act stipulates that a Licence cannot be granted unless the local chief of police 'is satisfied that the arrangements for exhibiting and keeping the firearms and ammunition in question' will not endanger public safety.<sup>198</sup> These security inspections are extremely thorough. They encompass building specifications, perimeter security, surveillance, alarms, lighting, exhibition arrangements, display cases, key control, staff vetting, and so on.<sup>199</sup> In the Armouries' case, this process takes place across all three of sites. As its venues come under the jurisdiction of different police authorities – West Yorkshire Police, the Metropolitan Police, and Hampshire Constabulary – each of them must be satisfied by the security arrangements at the relevant location before its Licence can be granted.<sup>200</sup> Subparagraph 1(4) then states that Museum Firearms Licences are subject to any conditions specified by the Secretary of State to secure the safe custody of all firearms and ammunition held by approved museums.<sup>201</sup> These binding terms are informed by the police inspections, augmenting the robust oversight over the licensing process. Museums must therefore demonstrate that their security arrangements conform to the highest standards in order to acquire a Museum Firearms Licence. Subparagraph 1(5) of the Schedule ensures that museums maintain their protective measures through the compulsory renewal of the Licence every five years, each time subject to another inspection.<sup>202</sup> If these conditions were not already rigorous enough, the 1988 Act deters the lax management of firearms through its provisions for rescinding a Licence. Subparagraph 2(3) outlines the grounds

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<sup>198</sup> *Firearms (Amendment) Act 1988*, p. 16.

<sup>199</sup> Home Office, *Firearms Licensing Law*, p. 144; Home Office, *Firearms Security Handbook*, pp. 19-22.

<sup>200</sup> Kaines, interview, 29 November 2021, p. 5.

<sup>201</sup> *Firearms (Amendment) Act 1988*, p. 16.

<sup>202</sup> *Firearms (Amendment) Act 1988*, p. 16.

for revocation: the local police believes maintaining the Licence would pose a danger to public safety; a museum fails to surrender its Licence when required; or a museum staff member is convicted of an offence under the Schedule to the 1988 Act (such as purposefully making false statements to procure a Licence or failing to comply with its conditions).<sup>203</sup> Institutions must diligently observe the terms of a Museum Firearms Licence, as its revocation would threaten the loss of their unique collections. The Armouries thus works closely with its regulatory bodies to ensure the maintenance of its Licence. Its registrar staff notify the relevant police constabulary, and often the Home Office as well, about major developments involving its firearms holdings – acquisitions, loans, or new security measures.<sup>204</sup> By proactively informing its licensing authorities of any important changes, the Armouries is much less likely to contravene the stringent conditions that govern the routine management of its firearms collections. The stewardship of a public weapons collection regularly entails this kind of careful trade-off. Shouldering an increased security burden is the price the Armouries must pay if it wishes to maintain greater institutional freedom in the use of its firearms holdings.

Of course, the framework of firearms law has not remained static since the introduction of the Museum Firearms Licence in the late 1980s. Firearms regulation has been extended intermittently over the following years, a process that the Armouries has monitored closely. Central to this development has been a huge expansion in Section 5 prohibited firearms and ammunition – from three categories when the *Firearms Act 1968* was passed to eighteen today.<sup>205</sup> Stricter regulation was not inevitable, as it has been motivated by specific historical events and decisions. The impact of high-profile shootings on the development of firearms legislation has been especially prominent, as the *Firearms (Amendment) Acts 1997* have already proven. Regrettably, Dunblane is not the only tragedy to have shaped English firearms law. Nine years earlier, a gunman killed sixteen people and injured fifteen more before committing suicide in the town of Hungerford. Like Dunblane, the perpetrator legally owned the pistol and two rifles that were used to carry out this mass shooting.<sup>206</sup> In response to the ensuing public outcry, the UK Parliament passed the *Firearms (Amendment) Act 1988*. Alongside introducing the Museum Firearms Licence, it reclassified numerous articles as prohibited Section 5

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<sup>203</sup> *Firearms (Amendment) Act 1988*, p. 17; *Firearms (Amendment) Act 1997*, p. 34.

<sup>204</sup> Bell, interview, 29 November 2021, pp. 4-5.

<sup>205</sup> Home Office, *Firearms Licensing Law*, pp. 20-24.

<sup>206</sup> Hill, p. vi.

weapons: burst-fire firearms, self-loading and pump-action rifles, self-loading and pump-action shotguns, smooth-bore revolvers, rocket launchers, mortars, explosive ammunition, and missiles.<sup>207</sup> This development has had long-term consequences for the regulation of museum firearms collections. Since the introduction of the 1988 Act, any institution intending to hold examples from this expanded group of objects has first had to secure an enhanced Museum Firearms Licence and implement the robust security measures this requires.<sup>208</sup> It is a sobering thought that the legal clampdown provoked by the Hungerford shootings still has a tangible effect on the management of museum firearms collections over thirty years later. For this reason, it is prudent for museums to anticipate future developments to firearms regulation. Any change to the legal framework can have a profound impact on the routine management of firearms collections, irrespective of its rationale. If a certain firearm model were to be reassigned from Section 1 to Section 5, for example, the Armouries' collections staff would soon have to identify the affected objects through audits and update institutional records to reflect their new legal status.<sup>209</sup> This procedure thus enables the Armouries to adapt its operations quickly and effectively to the evolution of firearms regulation, should the need arise. On balance, firearms law is as much a process as an edifice. Far from being monolithic and unchanging, the current body of legislation encompasses many different components that reflect the changing priorities of firearms regulation over the last fifty years. In short, firearms law can be productively conceptualised as an assemblage. Visualising this framework as an interconnected system of distinct and historically contingent statutes helps to explain its current complexity. The Armouries' registrar staff have to navigate this legislative palimpsest to determine the appropriate institutional approach to the management of its firearms collections.

While high-profile events have profoundly shaped the development of firearms regulation, the idiosyncrasies of the British political system have also played a notable role. The unusual regularity of stable parliamentary majorities has enabled quick legislative responses to mass shootings in the UK.<sup>210</sup> When there is the political will and sustained public pressure, firearms legislation can be enacted rapidly. Following both Hungerford and Dunblane, new firearms restrictions were adopted within two years – a

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<sup>207</sup> *Firearms (Amendment) Act 1988*, pp. 1-2.

<sup>208</sup> Home Office, *Firearms Licensing Law*, p. 142.

<sup>209</sup> Claire Lambert, Documentation Officer - Royal Armouries, interviewed by Stuart Bowes, 23 February 2023, p. 7.

<sup>210</sup> Hurka, p. 109.

quick turnaround in legislative terms.<sup>211</sup> However, the frequent haste of these legislative endeavours has also inadvertently allowed ambiguities to creep into firearms regulation over time. The status of Section 5 weapons under the Museum Firearms Licence offers an instructive example of this phenomenon in relation to museum operations. The *Firearms (Amendment) Act 1988* permits licensed museums to ‘have in their possession, purchase or acquire’ prohibited firearms and ammunition.<sup>212</sup> Museums could not legally hold such objects without this clause, but its wording does not satisfy all of their needs on close inspection. It does not empower museums to transfer Section 5 firearms, for instance, even to another licensed institution.<sup>213</sup> This could seriously impede the work of the Armouries and its peers, as lending programmes are a staple mode of access for museums, whether they hold fine art, figurines, or firearms. The ramifications of this legislative ambiguity were exposed in the course of everyday practice. Two museums had arranged a loan of a Section 5 firearm believing that they had observed the correct protocol. Prior to the object’s return, however, the Home Office blocked the move as its personnel concluded that the Museum Firearms Licence alone does not cover museum loans of prohibited firearms or ammunition.<sup>214</sup> Without the exemption provided by the Licence, museums are bound by Subsection 5(2A) of the *Firearms Act 1968* that makes it an offence to transfer Section 5 firearms without ministerial authority.<sup>215</sup> All museum loans of these objects would henceforth require explicit government approval. The Armouries perceived that this would create a serious obstacle for any institution holding prohibited firearms of cultural significance, so it mobilised its institutional experience to articulate museum needs. A compromise was soon reached to the effect that the Home Office now ratifies loans of Section 5 firearms between two licensed museums as a matter of course, provided there are no obvious complications.<sup>216</sup> This episode underscores a fundamental reality of weapons regulation: legislation is not infallible. Such discrepancies often produce different interpretations of legal conduct, in this case represented by the distinct conclusions drawn by the Home Office and the museum sector. To consult legislation in isolation is not always enough to determine a museum’s obligations under firearms law. The Armouries’ registrar staff must also accommodate

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<sup>211</sup> *Firearms (Amendment) Act 1988; Firearms (Amendment) Act 1997.*

<sup>212</sup> *Firearms (Amendment) Act 1988*, p. 16.

<sup>213</sup> Home Office, *Firearms Licensing Law*, pp. 142-43.

<sup>214</sup> Kaines, interview, 29 November 2021, p. 16.

<sup>215</sup> *Firearms Act 1968*, p. 4; *Anti-social Behaviour, Crime and Policing Act 2014*, p. 76.

<sup>216</sup> Bell, interview, 29 November 2021, p. 12.

the disposition of its regulatory authorities in the development of institutional collections management strategies. It is the most effective way of negotiating the inconsistencies that have infiltrated firearms law over the years.

### **Explosives Law**

The third and final body of legislation pertaining to the Armouries' weapons holdings is explosives law. Not only does it preserve examples of historical ammunition in its accessioned collections, but it also uses black powder to demonstrate the workings of firearms and artillery during public demonstrations.<sup>217</sup> These distinct holdings affirm the diversity of explosive substances, which heavily determines the overall nature of their regulation. Even when compared with the other branches of weapons law, the current legal definition of explosives has an especially expansive remit:

‘explosive substance’ means a substance or preparation [...] which is —  
 (a) capable by chemical reaction in itself of producing gas at such a temperature and pressure and at such a speed as could cause damage to surroundings; or  
 (b) designed to produce an effect by heat, light, sound, gas or smoke, or a combination of these as a result of a non-detonative, self-sustaining, exothermic chemical reaction.<sup>218</sup>

This formulation highlights a fundamental characteristic of explosives: their material volatility. The sensitivity of explosive substances to environmental changes can have grave consequences if the correct precautions are not observed. Preventing serious accidents caused by negligence has been a key premise underpinning the development of explosives law. This represents a significant difference from both firearms and edged weapons, which are materially inert and so pose limited danger in themselves. Their risk stems from their use or, rather, their misuse. Explosives can also be used purposefully to cause harm, but it is the destructive potential of their accidental detonation that sets them apart in law from other weapons. This dual threat is reflected in the structure of explosives legislation, which has two distinct strands: public security and occupational safety. The *Explosive Substances Act 1883* is an example of the first type, as the principal statute concerned with the use and possession of explosives with intent to

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<sup>217</sup> Kaines, interview, 29 November 2021, pp. 10-12.

<sup>218</sup> *The Explosives Regulations 2014*, SI 2014/1638 (London: The Stationery Office), p. 7.

endanger life or property.<sup>219</sup> As museums do not harbour such motives in the use of their explosives collections, this legislation is outside the scope of this thesis and will not be explored further. Instead, this section prioritises the other major branch of legislation, the regulation of explosive articles as an occupational hazard. This tradition has deep roots. Its first expression was the *Explosives Act 1875*, fuelled by a series of fatal accidents during the 1860s and 1870s that were the result of lax conduct around explosives.<sup>220</sup> It closely regulated the ‘manufacturing, keeping, selling, carrying, and importing’ of explosives, which included the introduction of a licensing system and official inspectors.<sup>221</sup> Although the 1875 Act has since been superseded by later statutes, explosives law still ultimately seeks to mitigate the destructive potential of explosive substances through occupational regulation. Its ongoing influence can be discerned in the Armouries’ efforts to protect staff, contractors, and visitors from the dangers inherent to the presence of explosives on museum premises.

The *Explosives Act 1875* may have established occupational safety as a key premise underpinning explosives law, but it was not until the 1970s that the current regulatory framework came into being. This legislative overhaul was largely prompted by the work of a committee chaired by Lord Robens, which conducted a comprehensive review of contemporary health and safety legislation. The resulting Robens Report of 1972 found that the legal apparatus for explosives initiated by the 1875 Act was no longer fit for purpose, concluding that their regulation should be incorporated into a comprehensive workplace safety regime.<sup>222</sup> This recommendation was realised by the *Health and Safety at Work etc. Act 1974*, which heralded a new era in occupational safety law. The regulation of explosives was subsumed into a general framework of obligations that outlined the respective roles of employers and employees in assuring safe working conditions. Three are particularly significant to museum practice: the duty of employers to guarantee the welfare of their employees (Section 2), the duty of employers to prevent non-employees from being exposed to risk (Section 3), and the duty of employees to observe all relevant health and safety provisions in the course of their routine work (Section 7).<sup>223</sup> Failure to comply with these responsibilities carries

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<sup>219</sup> *Explosive Substances Act 1883*, 46&47 Vict., c. 3 (London: HMSO).

<sup>220</sup> Jill H. Pellew, ‘The Home Office and the Explosives Act of 1875’, *Victorian Studies*, 18 (1974), 175-94 (pp. 178-82).

<sup>221</sup> *Explosives Act 1875*, 38&39 Vict., c. 11 (London: HMSO), pp. i-v, 1.

<sup>222</sup> Alfred Robens, *Safety and Health at Work: Report of the Committee 1970-72*, Cm. 5034 (London: HMSO, 1972), pp. 99-102.

<sup>223</sup> *Health and Safety at Work etc. Act 1974*, c. 37 (London: HMSO), pp. 2-4, 7.

severe penalties. Section 33 of the 1974 Act made it an offence to abortively discharge any duty required by Sections 2 to 7.<sup>224</sup> This clause ensured that the new arrangements possessed the necessary authority to provide an enduring framework for occupational safety. To this day, the Armouries' Health and Safety Policy opens by stating its duties as an employer to its employees and the general public under Sections 2 and 3, respectively.<sup>225</sup> While the 1974 Act marked a profound transformation in British health and safety law, the prominence accorded to explosives regulation represented a notable continuity. One of its foremost objectives remains 'controlling the keeping and use of explosive or highly flammable or otherwise dangerous substances, and generally preventing the unlawful acquisition, possession and use of such substances'.<sup>226</sup> The duties outlined in Sections 2, 3 and 7 thus apply directly to every operational interaction with explosive articles, as do the offences contained in Section 33. All institutions whose work involves explosives are fully liable for mitigating their potential risk to personal safety. Unlike the other branches of weapons law, the Armouries' status as a museum does not exempt it from this central obligation. For the purposes of the 1974 Act, it is an employer like any other with an unequivocal duty of care to all members of society.<sup>227</sup> The public claim on the Armouries' explosives collections makes its observation of health and safety legislation even more pressing.

It is important to note, however, that the *Health and Safety at Work etc. Act 1974* does not represent an exhaustive overview of explosives law. Outlining the finer points of health and safety regulation was never its purpose. Instead, the 1974 Act empowered lawmakers to formulate supplementary legislation to realise its aims in specific policy areas.<sup>228</sup> This provision has since enabled successive governments to enact detailed regulations covering key aspects of occupational safety. The 1974 Act may have set out the broad expectations surrounding the Armouries' explosives collections, but it is these subsequent measures that have predominantly determined their routine management by its registrar staff. The current expression of this focused legislative approach is the *Explosives Regulations 2014*, which effectively provides the entire technical apparatus of explosives regulation including their possession, storage,

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<sup>224</sup> *Health and Safety at Work etc. Act 1974*, p. 32.

<sup>225</sup> Royal Armouries, *Health and Safety Policy* (Leeds: Royal Armouries, 2022), p. 3.

<sup>226</sup> *Health and Safety at Work etc. Act 1974*, p. 2.

<sup>227</sup> Kaines, interview, 29 November 2021, p. 15.

<sup>228</sup> *Health and Safety at Work etc. Act 1974*, pp. 13-14.

use, transfer, and identification.<sup>229</sup> This statute thus supplies the detail of contemporary explosives law, complementing the general approach of the 1974 Act. The connections between these two pieces of legislation do not end there. The 2014 Regulation is enforced by Section 33 of the 1974 Act, which makes it an offence to contravene any health and safety regulations issued under its terms.<sup>230</sup> The regulation of explosives is encapsulated by these two key statutes, a stark contrast to the sprawling series of measures that constitute offensive weapons law and firearms law. However, this relative concision does not necessarily equate to practical simplicity. As the 2014 Regulation enforces an extensive regulatory framework that applies to all manner of explosives, its application to the Armouries' operations is not straightforward. It retains different explosive substances across its venues for a range of purposes: black powder and ammunition for working collections, black powder for firearms demonstrations, and historical small arms ammunition at its Leeds site; while at Fort Nelson it holds historical artillery shells as well as black powder for artillery firings.<sup>231</sup> This complex situation is compounded by the language of the 2014 Regulation. The term 'civil explosives' encompasses the majority of explosive substances held by the Armouries – primarily black powder – but excludes small arms ammunition regulated by the *Firearms Acts 1968 to 1997*.<sup>232</sup> Mirroring the other branches of weapons law, the nature of a particular article determines the enforced restrictions. Even from this cursory overview of the regulatory landscape, it is clear then that the Armouries' registrar staff have many variables to consider when determining access to its explosives collections.

The Armouries' various holdings are governed by the licensing system that forms the centrepiece of the 2014 Regulation. Any museum working with explosives in a routine capacity must secure two forms of authorisation, each with their own distinct requirements. The first of these is the certificate to acquire and keep explosives, which allows a fit person (or organisation) to possess designated explosive substances – although small arms ammunition is exempt given its regulation under firearms law.<sup>233</sup> The necessary background checks are overseen by the local police, one of the numerous enforcing authorities that constitute the assemblage of weapons regulation. In order to

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<sup>229</sup> *The Explosives Regulations 2014*, p. 109.

<sup>230</sup> *Health and Safety at Work etc. Act 1974*, p. 32.

<sup>231</sup> Kaines, interview, 29 November 2021, pp. 11-13.

<sup>232</sup> Health and Safety Executive, *Explosives Regulations 2014: Guidance on Regulations - Safety Provisions* (London: Health and Safety Executive, 2014), p. 104.

<sup>233</sup> *The Explosives Regulations 2014*, pp. 16-17.



obtain the certificate, all applicants must prove the following: they have a good reason to acquire explosives; they do not pose a danger to public safety; they are of sound mind and temperate habit; they are not a ‘prohibited person’ (primarily individuals convicted under the *Explosives Substances Act 1883*); they will prevent unauthorised interference with all explosives; and they can keep the explosives in a suitable location.<sup>234</sup> These criteria may appear stringent, but they are a proportionate response to the risk posed by explosives. At the Armouries, all staff who interact with explosives on a regular basis have to be certified, whether they manage ammunition stores, demonstrate historical weapons, or test modern firearms.<sup>235</sup> Responsible management of explosives thus begins at a personal level. It is important to note that these certificates are not issued for an entire organisation, but individual sites. As such, all of the Armouries’ venues where explosives are present require their own individual certificate. Each one must specify the type and maximum amount of explosives that can be kept onsite – 15 kilograms of black powder, for example, in its stores at Leeds.<sup>236</sup> Having a definitive overview of explosive holdings is crucial to both their custodians and regulatory authorities, as it enables them to determine the necessary safeguards. The Armouries’ registrar staff are responsible for overseeing the certification process, which entails keeping track of the people, premises, and products involved in careful explosives management. This is an ongoing commitment. Similar to the Museum Firearms Licence, the explosives certificate is renewed every five years, and the local police authority can revoke it if its conditions are breached or its holder is no longer deemed fit to manage explosives.<sup>237</sup> Both the Armouries as a whole and its individual personnel must therefore maintain spotless records if they are to continue using explosives as part of institutional programming. There is no margin for error when managing such sensitive items.

The second component of the licensing framework enacted by the 2014 Regulation is the licence for the storage of explosives. This is essentially a stronger counterpart to the acquire and keep certificate, which regulates greater concentrations of explosives. The storage licence does also apply to individual sites rather than entire institutions, but it has a higher initial threshold than the certificate. Under the 2014 Regulation, a licence is not needed to permanently store a combination of the following:

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<sup>234</sup> *The Explosives Regulations 2014*, pp. 9, 21, 27-28.

<sup>235</sup> Kaines, interview, 29 November 2021, pp. 12-13.

<sup>236</sup> Royal Armouries, ‘Certificate to Acquire and Keep Explosives: Royal Armouries Museum’ (unpublished internal document, 2022), pp. 1-2.

<sup>237</sup> *The Explosives Regulations 2014*, p. 29.

up to ten kilograms of shooters' powder (which includes black powder), up to an additional five kilograms of shooters' powder, and up to fifteen kilograms of small arms ammunition.<sup>238</sup> The Royal Armouries Museum in Leeds does not require a storage licence, as its quantities of both historical ammunition and black powder do not exceed the relevant margins. Its certificate to acquire and keep explosives specifies fifteen kilograms as the site limit for black powder, the maximum total that can be held without a licence.<sup>239</sup> In contrast, the need for a storage licence at Fort Nelson is undeniable. Its standard stock of black powder for artillery demonstrations far surpasses the limit for immunity (firing a single charge requires 300 grams), and, in any case, its historical artillery shells are often not exempt.<sup>240</sup> Not only do the type and quantity of explosives determine the licensing status of each site, but they also dictate storage requirements. The 2014 Regulation stipulates a range of additional conditions – separation distances, building specifications, and operational conduct – that correspond to the explosives held by individual licensees.<sup>241</sup> An institution's responsibilities under explosives law are designed to be proportionate to the potential damage their holdings could cause. The measures required to safeguard the large quantities of explosives held at Fort Nelson exemplify this principle. The demands made by the 2014 Regulation are considerable: a purpose-built magazine, secure storage within the Fort's confines, ample clearance between different processing areas, and closely monitored staff access. Even with these controls in place, the Armouries' collections staff have reduced the standard stock of black powder at the Fort in order to guarantee regulatory compliance.<sup>242</sup> These conditions have legal force, so it is the licence holders that must adapt their working practices. Like the other frameworks examined by this chapter, all licensees are subject to regular scrutiny to ensure their continued observation of the authorised standards of explosives management. The licence to store explosives is reviewed by the enforcing authorities every five years, who again have the power to vary its terms or revoke it entirely.<sup>243</sup> The latter outcome would cause serious upheaval for the Armouries, as this would heavily constrain the possession and demonstration of its artillery collections at the very least. This exacting system of oversight thus compels its registrar staff to

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<sup>238</sup> *The Explosives Regulations 2014*, p. 18.

<sup>239</sup> Royal Armouries, 'Certificate to Acquire and Keep Explosives', pp. 1-2.

<sup>240</sup> Kaines, interview, 29 November 2021, pp. 13-14; *The Explosives Regulations 2014*, p. 18.

<sup>241</sup> *The Explosives Regulations 2014*, p. 23.

<sup>242</sup> Kaines, interview, 29 November 2021, p. 14.

<sup>243</sup> *The Explosives Regulations 2014*, pp. 21, 26-30.

attentively observe the terms of its storage licence. Overall, the licensing arrangements vested in the certificate and the licence closely regulate the use of explosive articles by museums. The added burdens are critical to mitigating their destructive potential.

Alongside the elaborate licensing system enacted by the *Explosives Regulations 2014*, it also mandates a series of general provisions to foster careful interaction with explosives. Regulation 26 outlines the need to maintain a safe operational environment:

Any person who manufactures or stores explosives must take appropriate measures —

- (a) to prevent fire or explosion;
- (b) to limit the extent of fire or explosion [...] and
- (c) to protect persons from the effects of fire or explosion.<sup>244</sup>

The duties imposed by this clause are considerable, but the 2014 Regulation does not specify what it actually entails. As the enforcing body, the Health and Safety Executive (HSE) has issued guidance detailing the procedures, actions, and behaviours that constitute ‘appropriate measures’ for a given licence holder.<sup>245</sup> This example affirms the value of the expanded perspective afforded by an assemblage approach. If the letter of explosives law is considered in isolation, then it is easy to overlook the crucial role played by HSE and its guidance in framing access to explosives collections. The Armouries works closely with licensing authorities to develop a safety apparatus that corresponds to the magnitude of its explosives collections and thereby meets its legal obligations. Supplementing this general mandate for safe conduct, Regulation 28 stipulates that explosives must also be disposed of as carefully as possible.<sup>246</sup> While the Armouries aspires to maintain its accessioned explosives collections for future use, it has observed this requirement on the rare occasions where disposal has been the only option. When removing explosive substances from its historical artillery shells, for instance, it has brought in external specialists that routinely undertake this sensitive work.<sup>247</sup> Some legal obligations simply cannot be met by internal capacity alone, however developed it may be. Without external collaboration, the Armouries would find it difficult to use any form of explosives in conformity with its safety obligations.

The 2014 Regulation then turns to security concerns, controlling those allowed to come into contact with explosives. Regulation 30 states that anyone who holds

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<sup>244</sup> *The Explosives Regulations 2014*, p. 31.

<sup>245</sup> Health and Safety Executive, pp. 14-36.

<sup>246</sup> *The Explosives Regulations 2014*, p. 32.

<sup>247</sup> Bell, interview, 29 November 2021, pp. 7-8.

explosives must take ‘all appropriate precautions’ to prevent any unauthorised access to them by individuals that do not have the explicit permission of the licence holder.<sup>248</sup> Like the implementation of ‘appropriate’ safety measures, the open-ended nature of this clause aims to encompass diverse storage arrangements. Its practical application is again considered in substantial depth by parallel HSE guidance on the security provisions of the 2014 Regulation. The Armouries has incorporated many of its recommendations into operational practice: durable building fabric, robust storage cabinets, limited staff access to ammunition stores, and strict key control.<sup>249</sup> As the legislation cannot address every potential situation, the Armouries’ registrar team again cooperate with the relevant licensing authorities to fulfil its security obligations under explosives law. In addition, the 2014 Regulation directs its attention towards individuals perceived as more likely to compromise the integrity of explosives collections. Regulation 32 forbids any employer from knowingly employing a ‘prohibited person’ in any position where they could interact with explosives.<sup>250</sup> Staff screening is thus a key part of this security apparatus. Not only does the Armouries perform extensive security checks before confirming all new hires, but its staff who routinely work with explosives undergo further investigation by the police before they are certified.<sup>251</sup> Any ‘prohibited persons’ should be identified during this thorough process. The security restrictions around explosives are not limited to articles in situ. Under Regulation 31, any substances governed by the certificate to acquire explosives can only be transferred within Great Britain if the recipient also possesses this certificate.<sup>252</sup> In addition, Regulation 8 stipulates that any person receiving ‘civil explosives’ must seek prior approval from a competent authority – HSE in Great Britain or an equivalent international body.<sup>253</sup> If the Armouries intends to lend an explosive article to another museum, it must first ensure that the proper permissions and licensing arrangements are in place. Overall, the safety and security provisions of the 2014 Regulation are undeniably extensive, even if their practical ramifications do sometimes require clarification. Explosives are thus under

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<sup>248</sup> *The Explosives Regulations 2014*, pp. 32-33.

<sup>249</sup> Health and Safety Executive, *Explosives Regulations 2014: Guidance on Regulations - Security Provisions* (London: Health and Safety Executive, 2014), pp. 15-19; Kaines, interview, 29 November 2021, p. 11.

<sup>250</sup> *The Explosives Regulations 2014*, p. 34.

<sup>251</sup> Kaines, interview, 29 November 2021, p. 14.

<sup>252</sup> *The Explosives Regulations 2014*, p. 33.

<sup>253</sup> *The Explosives Regulations 2014*, pp. 19-20.

close observation throughout their time at the Armouries, as their acquisition, possession, use, and disposal are all heavily regulated.

The final requirement of the *Explosives Regulations 2014* is a comprehensive documentation system to support its licensing arrangements. Regulations 35 and 36 state that the following information must be noted about all explosives kept in the workplace: physical identification, quantity, location, details of all onward recipients, and the date of any further alteration, use, transfer, or destruction.<sup>254</sup> This obligation is not hugely demanding for the Armouries, as it is standard museum practice to maintain detailed object records within a collections database. Any institution following the Spectrum documentation standard, for example, will record the entry, acquisition, location, inventory, and exit of all its holdings at minimum.<sup>255</sup> With slight modification then, existing museum cataloguing systems can serve as a suitable repository for the required information on explosives collections. Unlike general museum registration procedures, however, the maintenance of these records must adhere to certain legislative conditions. This documentation must be updated and audited regularly, secured against all forms of tampering, and be intelligible to the custodian and any enforcing bodies.<sup>256</sup> This is no fleeting commitment. Records on all the Armouries' explosives must be kept for three years after their use, transfer, or destruction – even its small arms ammunition that is largely exempt from explosives law – while those for 'civil explosives' must be retained for ten years hence.<sup>257</sup> These provisions amount to a robust monitoring system, designed to ensure that explosives are accounted for at all times. In the unlikely event of explosive articles being lost by a museum, the 2014 Regulation also outlines the process of recovery. Regulation 37 orders that any loss of explosives must be reported promptly to the local police authority, providing details of the discovery along with the total quantity and description of explosives involved.<sup>258</sup> In compelling the responsible parties to notify law enforcement about misplaced explosives, it lessens the immediate risk to public safety by aiding their relocation. Ultimately, it is this premise that underpins the regulatory edifice established by the 2014 Regulation, as a specific application of occupational safety law. Holding and using explosives are dangerous acts, which must

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<sup>254</sup> *The Explosives Regulations 2014*, pp. 36-37.

<sup>255</sup> Collections Trust, 'Introduction to Spectrum' <<https://collectionstrust.org.uk/spectrum/spectrum-5/>> [accessed 1 March 2023].

<sup>256</sup> Health and Safety Executive, *Explosives Regulations 2014: Security Provisions*, pp. 34-35.

<sup>257</sup> *The Explosives Regulations 2014*, pp. 10, 36-37.

<sup>258</sup> *The Explosives Regulations 2014*, p. 38.

be closely regulated in the name of public welfare. Museum collections of explosives cannot be immune to these controls, as the harmful effects of an explosion are the same regardless of the reason for their possession. As exponents of public access, museums must be especially sensitive to their duty of care. The Armouries' registrar staff thus have to be able to prove beyond reasonable doubt that everything has been done to satisfy the objectives of explosives law.<sup>259</sup> To do anything less would jeopardise the safety of both its staff and the general populace it seeks to welcome through its doors.

### **Room for Manoeuvre: Interpretation, Negotiation, and Agency**

The previous sections have made it clear that the legal restrictions governing offensive weapons, firearms, and explosives differ greatly in approach and scope. But they do express at least one common theme, the regulation of weapons collections in museums is as much the product of interpretation as of content. Law does not always have a single definitive meaning that is acknowledged by all interested parties. Its practical application always involves some degree of mediation, depending on the reader's standpoint.<sup>260</sup> This is a relatively simple task when all parties accept the meaning of a particular clause. In certain cases where the law's requirements are unclear, enforcing bodies have intervened to provide an authoritative reading. The advisory documents published by HSE to clarify the safety and security requirements of the *Explosives Regulations 2014* have already been examined. Likewise, the Home Office has issued a *Firearms Security Handbook* that devotes a chapter to the stringent safeguards necessary to possess a Museum Firearms Licence under the terms of the *Firearms (Amendment) Act 1988*.<sup>261</sup> These documents are not legally binding on the Armouries, but their endorsement by the appropriate licensing bodies is a highly compelling reason to adopt their recommendations. Where the wording of legislation is ambiguous and no guidance exists, however, it can be difficult to proceed. A museum's reading of these passages may not exactly match the conclusions reached by other authorities. The regulation of offensive weapons in public spaces offers an instructive example. Under the *Prevention of Crime Act 1953*, it is permissible to have an offensive weapon in a public place with 'lawful authority' or 'reasonable excuse'.<sup>262</sup> It is currently assumed that the possession

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<sup>259</sup> Kaines, interview, 29 November 2021, p. 15.

<sup>260</sup> Janet Ulph, 'Dealing with UK Museum Collections: Law, Ethics and the Public/Private Divide', *International Journal of Cultural Property*, 22 (2015), 177-204 (pp. 198-99).

<sup>261</sup> Home Office, *Firearms Security Handbook*, pp. 19-23.

<sup>262</sup> *Prevention of Crime Act 1953*, p. 1.

of these articles during routine museum operations on an institutional site constitutes a legitimate exemption. Given the latitude of the term ‘reasonable excuse’, however, there is always the possibility that a discordant reading may emerge and break this consensus. With specific reference to weapons of cultural significance, the perspectives of key stakeholders – government personnel, regulatory bodies, law enforcement – can conflict with each other and museum thinking. If the development of legal restrictions is conceptualised as an assemblage, it reveals a contested process involving a range of agents.<sup>263</sup> Debate over individual legislative provisions often stems from nuanced disparities in the purpose of these various actors. The Home Office, for example, proclaims its duty to protect the public from the misuse of weapons, while the Armouries is committed to ensuring the positive contribution of these same collections to ‘public life and communities’.<sup>264</sup> When such distinct perspectives on the role of weapons within modern society prevail, it is no wonder that ambiguous aspects of their regulation can become a sticking point. If the Armouries is to maintain the integrity of its weapons collections in line with its duties as the national museum of arms and armour, it must make its concerns heard whenever debate ensues.

In reality, these sporadic divergences over the application of weapons law to cultural practice are rarely insurmountable. Together, the various interested parties generally work out some form of arrangement. The Armouries is regularly involved in these negotiations, as its status as a national museum makes it a natural representative for museums on the subject of weapons regulation.<sup>265</sup> Its dialogue with enforcing authorities has secured major concessions for museums. The success of the Armouries’ staff in streamlining the loan of Section 5 firearms between museums has already been raised. Coming to an agreement with the Home Office that a routine email would suffice to secure the necessary approval has simplified the process for both parties. Slight changes in the interpretation of a single clause can drastically affect the routine management of museum weapons collections. When a particular demand has appeared disproportionate to the observation of its legal duties, the Armouries’ staff have worked to uphold its interests. The Home Office has previously requested a full list of its firearms, which the Armouries has declined to provide on the grounds that its diligent maintenance of an up-to-date collections database is enough to meet its licensing

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<sup>263</sup> Gray and McCall, p. 25.

<sup>264</sup> Home Office, *Firearms Licensing Law*, p. 3; Royal Armouries, *Corporate Plan 2023-2028*, p. 2.

<sup>265</sup> McKnight, interview, 22 February 2023, p. 7.

obligations and that any further reporting would prove an impractical burden for all concerned.<sup>266</sup> This example highlights the value of cultivating a rigorous understanding of weapons legislation. The Armouries can negotiate with other authorities from a place of strength due to internal knowledge of its legal responsibilities. Generally, however, discrepancies over the application of weapons law are a rare occurrence. The desire for all parties to ensure the smooth operation of weapons regulation encourages genuine collaboration between the Armouries and its enforcing agencies. During the creation of the NFC, for example, its staff worked closely with the local police authority to develop a secure storage site for its large collection of modern firearms.<sup>267</sup> This collaborative approach to the observation of weapons law is by no means confined to major projects, as it also characterises the everyday management of these objects. The Armouries' registrar staff have thus regularly updated HSE about the recent changes to explosives procedures at Fort Nelson, such as the reduction of black powder held there, to continue meeting current legislative standards.<sup>268</sup> Both of these examples display the readiness of the Armouries to work with key authorities to assure the legality of its operations. As the application of weapons law can be so heavily influenced by the distinct priorities of multiple actors, cooperation between interested parties is an effective means of avoiding misunderstandings or transgressions. It is only as a last resort following the breakdown of this working consensus and the threatened imposition of unnecessary burdens that the Armouries' staff press their case.

The Armouries' engagement with weapons law extends beyond implementation to its very formulation. Its role as the national museum of arms and armour empowers it to enter the legislative process. The Armouries' input has often been solicited directly by government departments (usually the Home Office or DCMS), but it has interceded on its own initiative at times.<sup>269</sup> It has regularly harnessed the consultation process for prospective legislation, a valuable opportunity to enshrine the needs of museums in statute. For example, the Armouries has actively been consulted in recent government proposals to establish a legal definition of antique firearms and to classify certain large

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<sup>266</sup> Bell, interview, 29 November 2021, p. 7.

<sup>267</sup> Board of Trustees of the Royal Armouries, *Annual Report and Accounts for the Year Ended 31 March 2006* (London: The Stationery Office, 2007), pp. 7-8.

<sup>268</sup> Kaines, interview, 29 November 2021, pp. 13-14.

<sup>269</sup> Bell, interview, 29 November 2021, p. 11.



knives as prohibited offensive weapons.<sup>270</sup> In such instances, the Armouries is one of an assemblage of actors – encompassing museums, heritage groups, demonstrators, recreational users, and law enforcement agencies – seeking to influence the content of weapons law. It is one voice among many articulating the unique needs of cultural collections. The Armouries and other museums have also realised the value of pooling their efforts to get their concerns heard amongst this crowded field. The outcome of this collaboration has been the Museum Weapons Group (MWG), an expert body dedicated to addressing the challenges of weapons management in museums.<sup>271</sup> One of its roles is to advise on any proposed legal changes, drawing on its members’ combined knowledge of weapons regulation to inform the government of their potential impact on museums. There are even occasions where it is possible to pinpoint the Armouries’ contribution to this campaign. Following the 2015 Paris shootings, the EU Commission proposed the wholesale deactivation of high-risk firearms, including those in museum collections, a reaction that was averted partly through the representations of Armouries personnel.<sup>272</sup> The subsequent UK restrictions enacted by the *Policing and Crime Act 2017* on this subject specifically exempted the transfer of these objects between two institutions with Museum Firearms Licences.<sup>273</sup> Sometimes direct intervention is the most effective way to articulate museum needs. The Armouries’ agency in shaping weapons regulation is also exerted through the performance of its consultative role. It is in a strange position where its staff often hold greater subject knowledge than its regulatory authorities, especially on historical weapons. The Armouries has regularly invited Home Office personnel to the NFC for firearms training, while West Yorkshire Police have sought its guidance on the appropriate legal classification for certain obscure firearms.<sup>274</sup> This advisory function may not be as high-profile as its lobbying efforts, but it is just as important. The maintenance of an effective legislative framework relies on all parties possessing a shared understanding of both its terms and its practical application. The Armouries cannot just observe the legal restrictions pertaining to its own collections, its expertise also compels it to be an active contributor to the field of weapons regulation.

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<sup>270</sup> Home Office, *Proposals for Implementing Legislation to Define Antique Firearms: Government Response* (London: Home Office, 2020), p. 18; Home Office, *Consultation on New Knife Legislation Proposals*, p. 30.

<sup>271</sup> Robson, interview, 1 April 2022, p. 13.

<sup>272</sup> Mark Murray-Flutter, 'The EU Firearms Directive', *ICOMAM Magazine*, December 2016, p. 12.

<sup>273</sup> *Policing and Crime Act 2017*, pp. 145-46.

<sup>274</sup> Bell, interview, 29 November 2021, p. 12; Kaines, interview, 29 November 2021, p. 9.

Overall, there is no doubt that weapons legislation imposes notable restrictions on the Armouries' collections. The terms of offensive weapons law, firearms law, and explosives law are stringent, even allowing for the extensive exemptions for museums. This rigour derives from the converging forces that have informed the development of this legal edifice: historical precedent, legal process, governmental priorities, traumatic events, risk thresholds, public expectations, and technological advances, to name a few. As a unique combination of these actors has shaped each of the three traditions of weapons law, it follows that the controls they enforce on museum collections are quite distinct.<sup>275</sup> Offensive weapons law is the least onerous in its demands on museum practice. The Armouries' accessioned collections are almost entirely exempt from this body of legislation, aside from a few restrictions on the possession of crossbows. The regulations imposed by explosives law are much greater, comprising two overlapping licensing systems as well as a series of broader directives. Like all organisations, museums are bound by the universal claims of occupational safety that underpin this apparatus.<sup>276</sup> Firearms law is different again, exempting museums from its toughest measures but still subjecting them to a thorough licensing regime. It is also the legal corpus in greatest need of an overhaul, as its dispersal across an ever-growing series of statutes complicates its routine implementation.<sup>277</sup> The Armouries' registrar staff must be sensitive to the idiosyncrasies of these distinct legislative traditions in the course of their routine duties. If establishing a museum's obligations under weapons law was not already difficult enough, the fact that certain key passages are open to interpretation further inhibits its enforcement. It can be challenging to reconcile the major interests at stake in regulating weapons collections of cultural significance – museums, licensing authorities, law enforcement, and government departments. This is why the Armouries and these other bodies work hard to find common ground when debating the finer points of weapons law and their application to museum practice.<sup>278</sup> Consensus is greatly preferable to conflict. For all parties involved, there is no substitute for thorough understanding of this legal apparatus and its provisions for specific types of weapons. At the Armouries, its registrar staff are one of the main sources of this expertise. As those responsible for institutional compliance with its legal obligations (see Figure 1),

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<sup>275</sup> Hill, pp. xi-xviii.

<sup>276</sup> Health and Safety Executive, *Explosives Regulations 2014: Safety Provisions*, pp. 7-8.

<sup>277</sup> Rudi Fortson, *Firearms and the Law* (London: Law Commission of England and Wales, 2015), p. 118.

<sup>278</sup> McKnight, interview, 22 February 2023, p. 8.

they have to be aware of the stipulations, exemptions, and imperfections of weapons law that govern its routine operations. Developing public access arrangements that satisfy this multitude of provisions is far from straightforward. The legal restrictions on the Armouries' weapons holdings constrain institutional programming to an extent unfamiliar to most museums. Even so, it does possess a certain degree of agency to shape the terms of its regulatory framework. The relationship of weapons law to museum practice is multifaceted and interdependent, so casting it as a unilateral imposition only serves to obscure its rich complexity. The Armouries' registrar staff have greater room for manoeuvre than might be expected.

## Chapter 2: Professional Frameworks

I think there will be a theme through these questions that there isn't anything really specific out there for weapons collections. As a national museum, or as most museums and particularly accredited museums, you meet certain standards in terms of management of any collection, the information, access, care. You have to meet those standards because there isn't anything specific. When you look at PAS 197, for example, it's got this list of legislation at the back that applies to collections management, and nowhere does it talk about the specifics related to weapons collections or any other specific collection. Nor is there a separate document that you can look at that would do that for you.<sup>279</sup>

During a routine site visit of the National Security Adviser (NSA) to the Royal Armouries Museum in Leeds, the public display of firearms came up as a key topic of discussion. The NSA offered the suggestion that the Armouries could further improve the security of these exhibited objects by using cable locks, clamps, or bolts to fix them to their display cases.<sup>280</sup> In spite of the recommendation, this additional precaution has not been implemented in practice. There are a number of compelling reasons why the Armouries has chosen not to tether firearms in its public galleries: its existing display arrangements are already proportional to the risk; introducing more intrusive security measures would compromise public engagement with these objects; and it could set a binding precedent for cabling across the sector that may not be appropriate in every instance.<sup>281</sup> Firearms thus remain unfettered in the Armouries' exhibition spaces (see Figure 4), their security being assured in the first instance by the robust physical integrity of its display cases. What may initially appear as a simple difference in approach masks a complex network of actors, frameworks, and motives, whose intersection can be better navigated by applying the lens of assemblage theory. This particular episode is worth exploring in greater depth, as it reveals the considerable pressures originating in the museum sector that inform the provision of access to weapons collections. Weapons law is not the only regulatory apparatus that the Armouries' registrar staff must accommodate in the course of their duties.

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<sup>279</sup> Laura Bell, Director of Collections - Royal Armouries (2), interviewed by Stuart Bowes, 24 March 2022, p. 1.

<sup>280</sup> Jen Kaines, Head of Collection Services - Royal Armouries (2), interviewed by Stuart Bowes, 9 May 2022, pp. 8-9.

<sup>281</sup> Bell, interview, 24 March 2022, p. 14.

In order to appreciate the significance of this discussion, it is necessary to understand the role of the NSA – now superseded by the Manager, Security and Protection Advice (MSPA) – and their involvement with the Armouries. As its prior title clearly expressed, the MSPA is a national authority on matters of museum security, based at Arts Council England (ACE). Not only is the position-holder responsible for ensuring the general safety of the collections held by national museums, but they also oversee the security arrangements for all loans facilitated by the Government Indemnity Scheme.<sup>282</sup> It is unwise for any cultural institution to proceed with a major collections initiative without first consulting the MSPA. This is especially true for the Armouries, given its position as a national museum and the heightened threat posed by its weapons collections. Consequently, the MSPA is responsible for supervising its institutional operations in a number of key areas: conducting the security reviews required to maintain its accredited status, overseeing its participation in GIS, and authorising all of its loans out.<sup>283</sup> It is hardly surprising then that the Armouries' registrar team work hard to maintain an effective working relationship with the MSPA. They form a natural partnership for the most part, as their priorities are aligned in seeking to mitigate the genuine risks presented by the storage and use of weapons collections. Generally, the Armouries' staff comply with the MSPA's recommendations as a matter of course, recognising their authority and expertise in the field of collections security.<sup>284</sup> Loans are a key area that relies on a common understanding between them, as it is a process often fraught with unexpected difficulties and additional security concerns. The Armouries may have chosen not to cable firearms down in its own galleries, but it does implement this extra safeguard when it lends them to other museums without a security apparatus of equivalent strength.<sup>285</sup> When operating in an unfamiliar institutional context, its registrar staff readily follow the advice of the MSPA as the approver of national museum loans. It is in the interests of both parties that their dealings proceed smoothly, as close cooperation is the most effective way of ensuring that the Armouries' weapons collections remain secure during public engagement.

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<sup>282</sup> Collections Trust, 'Further Advice about Security' <<https://collectionstrust.org.uk/resource/further-advice-about-security/>> [accessed 16 March 2023].

<sup>283</sup> Kaines, interview, 9 May 2022, p. 8.

<sup>284</sup> Royal Armouries, 'Loans' <<https://royalarmouries.org/about-us/collection-management/loans/>> [accessed 18 July 2023].

<sup>285</sup> Robson, interview, 1 April 2022, pp. 6-7.



**Figure 4: Untethered Webley-Fosbery Automatic Revolver – Royal Armouries**

Photographed by the author, 10 June 2022.



**Figure 5: Tethered Webley Mark VI Revolver – Imperial War Museum**

The Firearm Blog, 'Imperial War Museum London – Part I'

<<https://www.thefirearmblog.com/blog/2017/01/12/imperial-war-museum-london-part/>> [accessed 31 May 2022].

If the working relationship of the Armouries and the MSPA is typically harmonious, then what prompted their different positions on its firearms displays? Firstly, there are strong pressures towards the standardisation of weapons management in museums. The Armouries is not alone in striving to reconcile the elaborate provisions of weapons law with cultural collections practice. Responding to unique operational

circumstances, individual museums have developed distinct approaches to the challenge of maintaining the integrity of their weapons collections. The former NSA cited the example of the Imperial War Museum (IWM) to support this further safeguard, who routinely cable firearms in their exhibition spaces (Figure 5).<sup>286</sup> As this measure offers an extra layer of protection, it is logical that the NSA recommended its adoption across the sector, including at the Armouries. If two national institutions cabled their firearms collections on public display, it would effectively enshrine it as standard practice for all UK museums. In contrast, the underlying premise of the Armouries' stance is that security arrangements must be appropriate to the specific needs of each institution.<sup>287</sup> Cabling firearms may therefore suit IWM's situation, while also being surplus to requirements at the Armouries. The difference in the respective positions held by the Armouries and the NSA is more comprehensible from this perspective, as both approaches have their merits. It is essential to place this episode within its wider institutional context. Cabling firearms is not the only safeguard implemented by museums to maintain the security of weapons collections when on display. Robust display cases, continuous CCTV, regular invigilation, clear lines of sight, and the separation of prohibited firearms all contribute to the Armouries' multi-layered security apparatus.<sup>288</sup> Securing firearms to the display cases would augment these provisions, but the existing arrangements are already highly effective without this further precaution. As such, the decision not to cable down exhibited firearms is hardly a repudiation of the Armouries' duty to uphold public safety. The difference between its institutional stance and the NSA's position is much less stark than first appearances suggest. The issue at stake is whether the prevailing security measures are robust enough to reduce the risk of displaying weapons to acceptable levels. It is essentially futile to prescribe a definitive response to such a multifaceted endeavour, so it is no wonder that these two parties came to different conclusions on the value of cabling the Armouries' firearms.

These distinct perspectives on public firearms display portend an underlying trend identified by the opening quotation of this chapter – the lack of authoritative guidance on weapons management in museums. General standards of best practice in collections management have been codified in numerous forms: government directives,

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<sup>286</sup> Robson, interview, 1 April 2022, p. 7.

<sup>287</sup> Paisley S. Cato, 'Security Systems and Fire Protection Systems', in *MRM6: Museum Registration Methods*, ed. by John E. Simmons and Toni M. Kiser, 6th edn (Lanham: Rowman & Littlefield, 2020), pp. 401-04 (p. 401).

<sup>288</sup> Bell, interview, 29 November 2021, p. 4.

accreditation programmes, professional guidelines, and discipline-specific codes.<sup>289</sup> Yet, these frameworks rarely address the particular needs of weapons holdings. The Museum Accreditation Scheme (MAS) and GIS, the two structures that bring together the MSAP and the Armouries, both exemplify this tendency. While they each prescribe a minimum standard of museum security, they do not stipulate specific protections for weapons collections, let alone pronounce a judgement on the need to cable firearms.<sup>290</sup> It is necessary to look elsewhere to ascertain the roots of the Armouries' and the NSA's divergent stances on the matter. The only source of guidance that specifically addresses the issue of securing exhibited firearms – and one of the few to consider the regulation of museum weapons collections at all – is the Firearms Security Handbook issued by the Home Office. It states: 'Where small firearms or concealed firearms are displayed, separate devices/fixtures should be fitted to secure the exhibit(s) to the body of the cabinet.'<sup>291</sup> This provision does reinforce the NSA's position, but it is not binding (expressed using 'should' rather than 'must'). It was shown in the previous chapter that the Handbook can only provide recommendations, so the Armouries is under no obligation to introduce this measure if its staff decide it would be counterproductive to its work. Short of including it as an official condition of its Museums Firearms Licence, the Armouries ultimately has the final say whether or not to cable down its displayed firearms collections. The NSA's suggestion may be supported by the available guidance for museums, but the Armouries' objection is equally valid under the terms of weapons law. This episode anticipates many key hallmarks of the governance of museum weapons collections: the unwavering pursuit of best practice in collections management, the proliferation of institutions and operational frameworks shaping the overall field, the complex interaction of legal and museological structures, the weight of interpretation, competing perceptions of access, the need for sustained collaboration, and, critically, the absence of weapons from existing professional standards. This last consideration has had a marked effect on the management and use of Armouries' weapons holdings. Where no specific guidance exists, its registrar staff are obliged to interpret and apply the relevant frameworks to the best of their ability. The Armouries has thus forged a path in many other areas besides the secure exhibition of firearms.

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<sup>289</sup> Miller, p. 28.

<sup>290</sup> Museum Accreditation, *Accreditation Guidance* (London: Arts Council England, 2019), pp. 38-39; Arts Council England, pp. 78-80.

<sup>291</sup> Home Office, *Firearms Security Handbook*, p. 33.



## A Broader Perspective

This debate over firearms display clearly demonstrates that the restrictions applied to the Armouries' weapons collections are not solely rooted in legislation. There is a much greater range of powers at work. Overlaying the edifice of weapons law is a series of statutes, codes, and guidelines that are intended to foster robust working practices across the museum sector. As material objects remain a definitive part of contemporary museum identity, collections management is a key concern of these frameworks.<sup>292</sup> In pursuit of best practice during their routine duties, the Armouries' registrar staff thus observe these museological provisions over and above the demands of weapons law. The first set of structures expressly address the Armouries itself. Both the foundational *National Heritage Act 1983* and its DCMS Management Agreement lay out the overall parameters governing the use of its collections. As for broader professional guidance, the Armouries' overarching Collections Policy Framework is a useful starting point. It outlines the museological standards that inform its approach to collections management: DCMS's Combating Illicit Trade guidelines, Museum Accreditation, Spectrum 5.0, and PAS 197 (since superseded by BS 17820).<sup>293</sup> Moving beyond this general overview to more specialist subjects, there is also detailed sector guidance governing museum loans in the form of GIS.<sup>294</sup> Given the extent of this occupational apparatus, the Armouries' registrar staff hardly appear to lack support in developing coordinated strategies to manage the national collection of arms and armour. However, it is important to note that collections management is a broad discipline.<sup>295</sup> Some of these frameworks do not specifically address the practices covered by this thesis. The Combating Illicit Trade guidance, for example, is primarily concerned with the effective performance of due diligence on incoming objects rather than the mobilisation of existing collections.<sup>296</sup> Its provisions are largely tangential to this study and therefore will not be pursued further here. Even those professional guidelines that are concerned with collections access do not generally tackle the challenges posed by particular object types. Plurality alone does

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<sup>292</sup> International Council of Museums, 'Museum Definition'.

<sup>293</sup> Royal Armouries, *Collections Policy Framework*, pp. 3-4.

<sup>294</sup> Arts Council England, pp. 3-4.

<sup>295</sup> *MRM6: Museum Registration Methods*, p. 542.

<sup>296</sup> Department for Culture, Media & Sport, *Combating Illicit Trade: Due Diligence Guidelines for Museums, Libraries and Archives on Collecting and Borrowing Cultural Material* (London: Department for Culture, Media & Sport, 2005), p. 3.

not guarantee specificity, so it is necessary to assess the individual impact of each scheme on the management of the Armouries' weapons collections.

Another complication resulting from this abundance of applicable frameworks is that it greatly expands the range of actors involved in determining access to museum weapons collections – a theme that is especially apparent when taking an assemblage perspective. Government departments, sector support organisations, and professional bodies all contribute to the administration of these museological guidelines to varying degrees.<sup>297</sup> The Armouries' registrar staff are thus required to develop durable working relationships with each of these diverse stakeholders, reconciling their purposes with those of the agencies responsible for overseeing the implementation of weapons legislation. Variation in the scope, priorities, and powers of these cultural agencies – such as DCMS, ACE, and Collections Trust – has a marked influence on the nature of their involvement. As such, the impact of their provisions on the management and use of the Armouries' weapons collections is far from uniform. One major variable that determines the practical application of these distinct frameworks is their geographical remit. The *National Heritage Act 1983* and the DCMS Management Agreement are unusual in their explicit focus on the Armouries' operations as an individual institution. Here, its status as a national museum introduces an extra dimension to the prevailing regulatory assemblage. It is more common for museological standards to operate at a national level, with bodies like DCMS and ACE primarily tailoring their initiatives to the idiosyncrasies of the British cultural landscape.<sup>298</sup> These structures aim to strike a stable balance between general applicability and institutional pertinence. Lastly, BS 17820 and Spectrum are distinguished by their international scope, advancing templates for various aspects of collections practice that seek to transcend national differences (although the partial inclusion of their provisions within MAS means they do exert particular authority in a British context).<sup>299</sup> The reach of a given framework informs its relevance to the Armouries' unique circumstances as the national museum of arms and armour and, by implication, the impact it has on its weapons holdings. This further crowding of the regulatory landscape only complicates the provision of access to its collections, an endeavour already constrained by its legal obligations.

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<sup>297</sup> Gray and McCall, pp. 22-23.

<sup>298</sup> Mendoza, pp. 12-13.

<sup>299</sup> Lambert, interview, 23 February 2023, pp. 9-10.

It is important to note, however, that these frameworks do not always operate in the same way as weapons law. They are much more diverse in their composition and emphasis. While there are invariably compelling reasons for the Armouries to observe these standards, the operational urgency of their enforcement varies from case to case. The regulation of museum practice is occasionally rooted in legislation, but it is more often enforced through subtler means linked to funding opportunities or reputational standing.<sup>300</sup> Even where this guidance is not compulsory, it would still be unwise for the Armouries to overlook the relevant recommendations. Then there is the depth of their content. It is possible to discern a notable split in the overall focus of these various governance systems: those seeking to inform all aspects of museum practice and those that exclusively pursue collections management.<sup>301</sup> Subject-specific guidance such as BS 17820 or the GIS annexes generally govern institutional practice in greater detail than broader frameworks like MAS, where collections management is just one of many concerns. This contrast in approach ultimately has important ramifications for the routine work of the Armouries' registrar staff. Despite these variations, the constituent components of this museological apparatus nevertheless follow the same underlying principle of general applicability. They are generally more concerned with maintaining overall standards of collections management than addressing the challenges of particular object types, even where these are considerable.<sup>302</sup> The breadth of these frameworks decisively impacts their application to the Armouries' weapons collections and the development of appropriate management strategies by its registrar staff. This is not as simple as identifying the requirements of each standard and implementing them in turn. They are closely interconnected in practice, often referencing each other as well as the relevant legislation.<sup>303</sup> It is therefore the aim of this chapter to draw out the intricacies of this elaborate regulatory assemblage to convey their focal role in dictating access to the Armouries' weapons collections. These overlapping systems of museum governance are no less significant to the work of its registrar staff than the provisions of weapons law.

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<sup>300</sup> Ulph, 'Dealing with UK Museum Collections', p. 189; Rex, p. 193.

<sup>301</sup> Bruce A. Campbell and Christian Baars, 'Introduction', in *The Curation and Care of Museum Collections*, ed. by Bruce A. Campbell and Christian Baars (Abingdon: Routledge, 2019), pp. xvi-xix (p. xvii).

<sup>302</sup> Sophie Rowe, 'Managing Small Radioactive Collections in the UK: Experiences from the Polar Museum, Cambridge', *Journal of Conservation and Museum Studies*, 16.4 (2018), 1-14 (p. 1).

<sup>303</sup> Selwood and Davies, p. 46.

### **Government Oversight: Governance of the Royal Armouries**

As this chapter seeks to examine the museological frameworks that affect the use of the Armouries' weapons collections, it is apt to begin with those that directly address its practice. The foremost of these is the *National Heritage Act 1983*, which constitutes the current legal foundation of the Armouries as the national museum of arms and armour. Formulated as part of government efforts to standardise the administration of its cultural dependants, this law was designed to establish parity in its governance with collecting institutions of similar national significance.<sup>304</sup> With only minor alterations, the 1983 Act has determined the Armouries' operational structure for four decades. While its clauses primarily outline the composition and jurisdiction of the Board of Trustees, they are not altogether silent on the issue of collections access. Under Subsection 18(2), the Armouries is mandated to 'care for, preserve and add to' and 'maintain a record of' all objects under its charge.<sup>305</sup> The duty to maintain and enhance its holdings hardly seems restrictive at first. After all, effective collections stewardship and documentation are key cornerstones of contemporary museum practice.<sup>306</sup> Yet, these constitutional obligations conflict with the Armouries' other core purposes. The conditions most suitable for an object's care are rarely the same as those that are favourable to the facilitation of public access.<sup>307</sup> This is a tension that all museums must negotiate in some form, but its impact on the Armouries is complicated by the presence of weapons collections. Beyond this general requirement, the 1983 Act does not regulate the internal management of any specific objects. Yet the very existence of these clauses recognises that certain controls are necessary to maintain the future integrity of the Armouries' collections. The 1983 Act adopts a similar approach to lending. It again phrases the Armouries' obligations in positive terms, although the applicable caveats are more explicit. The Board may lend its collections, provided that it considers the 'suitability of the prospective borrower, the purpose of the loan, the physical condition and degree of rarity of the object, and any risks to which it is likely to be exposed'.<sup>308</sup> In short, its objects can be loaned but only if the Armouries' registrar staff determine that the benefits outweigh any potential risks. Once again, public engagement with the Armouries' collections must be weighed

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<sup>304</sup> House of Commons, *Hansard's Parliamentary Debates: The Official Report* (24 February 1983, vol. 37, cols. 1064-72) (London: Hansard).

<sup>305</sup> *National Heritage Act 1983*, p. 11.

<sup>306</sup> International Council of Museums, *ICOM Code of Ethics*, p. 8.

<sup>307</sup> Simmons, 'Collection Care and Management', p. 240.

<sup>308</sup> *National Heritage Act 1983*, p. 14.

carefully against its other institutional duties, imposing a negotiated limit on their accessibility. This is even more of a complex process where its weapons holdings are concerned, even though they are not singled out by the 1983 Act. Not only must the Armouries observe its legal duties as a national museum, but it also has to meet the rigorous demands of weapons law. It is ultimately the responsibility of its registrar staff to strike an appropriate balance between these competing claims.

The influence of the *National Heritage Act 1983* over the Armouries' collections extends beyond its immediate terms. Nowhere is this more apparent than its funding arrangements. Section 22 of the 1983 Act permits the Armouries to receive government revenue to cover institutional expenses, with the crucial proviso that these payments carry any 'such conditions as the Secretary of State imposes'.<sup>309</sup> The details of the current understanding between the Armouries and DCMS are set out in its Management Agreement. Common to all national museums, these settlements designate the level of Grant-in-Aid funding received by each institution and the political expectations as to how it should be spent.<sup>310</sup> This is crucial to the Armouries' existence. In the 2021-22 financial year, Grant-in-Aid constituted 79 percent of its total income.<sup>311</sup> The Armouries can hardly resist any claims made by its DCMS Management Agreement, as the loss of its main income stream would be disastrous. Government control of such a large part of the Armouries' funding theoretically enables it to enforce certain operational practices in any given area. The notional existence of a power, however, does not guarantee that it will be exercised. While the current Management Agreement does impose controls on the Armouries' operations, these mainly address institutional integrity and financial accountability. It rarely mentions collections at all. Aside from maintaining free entry to the Armouries' permanent collections, the only other relevant passage outlines the broad duty to protect its 'world-class collections'.<sup>312</sup> This requirement strongly resembles the formulation used in the 1983 Act and operates in a very similar fashion. The need to safeguard the collections means that limits have to be placed on public accessibility, so the Armouries' staff are charged with working out the details. The regulatory burden of this apparatus may be relatively light at present, but the Agreement could be amended in

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<sup>309</sup> *National Heritage Act 1983*, p. 15.

<sup>310</sup> Department for Digital, Culture, Media & Sport, pp. 15-16.

<sup>311</sup> Board of Trustees of the Royal Armouries, *Annual Report and Accounts 2021-22*, p. 60.

<sup>312</sup> Department for Culture, Media & Sport, *Royal Armouries Management Agreement 2016-2020* (London: Department for Culture, Media & Sport, 2016), p. 1.

future to better meet perceived social and cultural needs.<sup>313</sup> There have been no revisions so far that have affected public access to the Armouries' collections in any meaningful capacity, but the potential is always there. Its registrar staff must remain alert to the possibility of greater political intervention.<sup>314</sup> As things stand, neither the 1983 Act nor the DCMS Management Agreement tackle the unique issues raised by the stewardship of the national collection of arms and armour. These instruments may be central to the Armouries' existence, but they mainly determine its strategic governance. On the rare occasions they do address its collections, they articulate general objectives instead of detailing specific management requirements. After all, civil servants and politicians are not appointed for their detailed knowledge of collections practice. It is thus necessary to look beyond the Armouries' constitutional arrangements to better grasp the influence of museological frameworks on the use of its weapons holdings.

### **Framing Collections Policy: BS EN 17820:2023**

The first part of the museological apparatus governing the Armouries' weapons collections is BS EN 17820:2023, Specifications for the Management of Moveable Cultural Heritage Collections (BS 17820). The British expression of a European cultural initiative, this framework was designed to provide standard operational specifications for effective collections practice.<sup>315</sup> It is thus relevant to all institutions tasked with maintaining material culture of some kind, libraries and archives as well as museums. Its breadth is reflected in the wide range of organisations represented on its preparatory committee. Alongside a British Standards Institution (BSI) representative, its members were drawn from governments, societies, libraries, archives, galleries, and museums, including the Armouries by chance.<sup>316</sup> It thus brought together a range of practitioners to develop accepted operational standards that would apply across the cultural sector. In this way it strongly resembles the PAS 197 Code of Practice for Cultural Collections

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<sup>313</sup> Department for Digital, Culture, Media & Sport and National Museum Directors' Council, *Museums' Partnership Framework* (London: Department for Digital, Culture, Media & Sport, 2018), p. 3.

<sup>314</sup> Stuart Bowes, 'On Museums, Conflict, and Forgetting: An Immutable Cultural Heritage?', *Working Papers in the Humanities*, 17 (2022), 45-53 (pp. 47-48).

<sup>315</sup> British Standards Institution, *BS EN 17820:2023 Conservation of Cultural Heritage: Specifications for the Management of Moveable Cultural Heritage Collections* (London: British Standards Institution, 2023), p. 4.

<sup>316</sup> British Standards Institution, 'B/560/2 - Sub-committee to Mirror Work of CEN/TC 346/WG 16' <<https://standardsdevelopment.bsigroup.com/committees/50297499>> [accessed 21 July 2023].

Management on which it was built, in both approach and content.<sup>317</sup> The outcome of this collaborative endeavour was a framework concerned with collections management from a strategic perspective. BS 17820 outlines the overarching policy structure required to effectively manage material culture rather than focusing on the details of day-to-day practice.<sup>318</sup> As such, it informs the overall direction for the custodianship of museum collections. BS 17820 first lists the optimal features of collections management policy, and then addresses the specific needs of its four main components: collections development, collections information, collections access, and collections care and conservation.<sup>319</sup> All museums are strongly advised to develop policies covering each of these areas, whose individual contents are described in detail by BS 17820. While its provisions are not automatically binding in the same way as legislation, there is nevertheless an expectation that all institutions will strive to meet the terms of BS 17820 as a template for best practice recognised throughout the museum sector.<sup>320</sup> As a national museum, the Armouries is expected to set an example by demonstrating the highest standards of conduct across all of its activities. Its registrar staff have thus developed its collections policy in accordance with BS 17820, codified in four documents that mirror its division of collections management.<sup>321</sup> Given the prevailing authority of the Armouries' collections policies, institutional observance of this standard indirectly shapes the use of its entire holdings. As such, this section seeks to examine the impact of BS 17820's strategic emphasis on the Armouries' weapons collections, even where this is not immediately evident. Operational policy is as significant as routine procedure in facilitating access to these restricted objects.

BS 17820 begins by setting out the general principles that underpin an effective collections management framework. These are designed to inform all collections-related policies developed in line with its provisions, from access to care. General applicability is a recurring theme throughout BS 17820, an approach that is reflected in the absence of guidance addressing particular collection types. As such, weapons are not covered explicitly by the standard's recommendations for the creation of a functional collections management policy framework. There is a good reason for this omission. If BS 17820

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<sup>317</sup> British Standards Institution, *BS EN 17820:2023 Tracked Changes* (London: British Standards Institution, 2023), p. ii; British Standards Institution, *PAS 197:2009 Code of Practice for Cultural Collections Management* (London: British Standards Institution, 2009).

<sup>318</sup> Robson, interview, 1 April 2022, p. 3.

<sup>319</sup> British Standards Institution, *BS 17820*, pp. 9-11.

<sup>320</sup> Bell, interview, 24 March 2022, p. 6.

<sup>321</sup> Royal Armouries, *Collections Policy Framework*, p. 5.

sought to specify policy requirements for every object type held by museums, it would become unworkable in practice.<sup>322</sup> It ultimately prioritises breadth over depth. BS 17820 does nonetheless acknowledge that weapons collections may require extra precautions, albeit by implication. It states that all collections management policy should be ‘appropriate’ to institutional circumstances, including the nature of objects.<sup>323</sup> Given the elevated risk involved in the possession and use of weapons, BS 17820 effectively obliges any museum holding them to build greater safeguards into its operational policy. The broad nature of this formulation directs the institutions themselves to determine a suitable response. This works on the premise that individual museums are best placed to determine the structural apparatus governing their collections activities, as the experts in their given field. BS 17820 first stipulates the essential elements of collections policy, which the Armouries then must apply to the management of the national collection of arms and armour.<sup>324</sup> Its registrar staff are thus expected to formulate institutional policy that accommodates the unique needs of weapons collections, while working to the broadest possible brief. On the subject of staff competency, for example, BS 17820 recommends the delivery of training programmes tailored to the demands of managing specific institutional collection types.<sup>325</sup> This is especially important for weapons, where the consequences of mismanagement are likely to be serious. It would not be difficult for personnel to overlook the additional precautions for the routine movement of firearms, if they had not been made aware of their particular needs.<sup>326</sup> The practical outcome is that the Armouries is obliged to establish procedures designed to familiarise its staff with the complexities of maintaining its collections, even if this does seem like basic common sense. This clause highlights one of the main challenges of this museological framework, that its application to weapons collections is rarely self-evident. Just because the provisions of BS 17820 do not single out weapons, this does not mean they have no impact on the Armouries’ operations.

Alongside its general recommendations, BS 17820 includes a basic checklist for each of its constituent policy areas and their subsidiary procedures. Three of these – collections access, collections information, and collections care – play an important role in shaping the institutional use of all museum objects. Similar to the rest of BS 17820,

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<sup>322</sup> Kaines, interview, 9 May 2022, p. 2.

<sup>323</sup> British Standards Institution, *BS 17820*, p. 11.

<sup>324</sup> Royal Armouries, *Collections Policy Framework*, pp. 4-5.

<sup>325</sup> British Standards Institution, *BS 17820*, p. 10.

<sup>326</sup> Robson, interview, 1 April 2022, pp. 13-14.



these individual policy templates do not specifically mention weapons at any point.<sup>327</sup> Yet, it is also evident that this targeted guidance adopts the same proportional approach, obliging the Armouries to anticipate the challenges posed by its collections in each of these areas. BS 17820's first provision for effective collections care policy is that museums should exercise risk management during all collections activities.<sup>328</sup> It makes sense that museums should strive to mitigate any threats posed by their collections – especially weapons – so BS 17820 gives it operational force. In this vein, the Armouries recently pursued a comprehensive review of its collections security to better manage public access to its stores.<sup>329</sup> Regular policy audits are one strategy employed by its registrar staff to lower the risks of using weapons collections in routine programming. While it is difficult to pinpoint the role of BS 17820 in fostering this institutional ethos of risk management, it is surely a contributing factor. Its annex on collections information likewise infers the need for additional measures to safely utilise weapons collections. Beyond broad motions to implement secure data storage and protect item records, BS 17820 also directs museums to closely inspect the security features and user permissions of their collections management system.<sup>330</sup> Given the heightened degree of confidentiality imposed on certain weapons in the Armouries' collections (see Chapter 3), it is vital that its staff have full control over the availability of related information. Even its coverage of collections access expresses the same concern for the integrity of museum holdings. BS 17820 recommends that institutional policy should outline all barriers to the public use of collections as well as the approaches to overcome them.<sup>331</sup> Few museum objects are subject to greater barriers than weapons. The Armouries' Collections Access policy duly outlines its operational constraints, such as 'designated areas of high security' where access is regulated and the individuals legally prohibited from possessing its weapons.<sup>332</sup> Here, BS 17820 mainly serves to clarify existing arrangements. Its facilitatory role conveys another facet of collections access that reveals the frictions of museum practice. A BS 17820-compliant policy should manage 'the demands of access and long-term protection and security, in accordance with the outcome of risk assessments'.<sup>333</sup> This clause epitomises the fundamental dilemma of

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<sup>327</sup> Bell, interview, 24 March 2022, p. 5.

<sup>328</sup> British Standards Institution, *BS 17820*, p. 19.

<sup>329</sup> Kaines, interview, 9 May 2022, pp. 11-12.

<sup>330</sup> British Standards Institution, *BS 17820*, pp. 15-16.

<sup>331</sup> British Standards Institution, *BS 17820*, pp. 17-18.

<sup>332</sup> Royal Armouries, *Collections Access Policy*, p. 3.

<sup>333</sup> British Standards Institution, *BS 17820*, p. 17.

public weapons collections. But practitioners seeking clear solutions reach a dead end, as BS 17820 provides no further guidance for striking this delicate balance. It contains no resolution to the tension between access and regulation inherent to the Armouries' weapons holdings. BS 17820 may provide the basic policy structure, but its registrar staff are responsible for populating this template to best serve institutional audiences.

A key strength of BS 17820 is its awareness of the interconnected nature of the governance structures surrounding museum collections. It calls for organisational policy to profess compliance with the relevant 'legal and ethical requirements' imposed on their objects.<sup>334</sup> This is certainly important for weapons management, as it is governed by a complex regulatory assemblage formed of numerous statutes, standards, and codes. However, BS 17820 does not provide any indication as to what these might be. In keeping with its broad focus, it does not address the frameworks governing specific collection types.<sup>335</sup> The omission of weapons regulation limits its effectiveness in clarifying the Armouries' duties. BS 17820 nevertheless places a strong emphasis on helping institutions to meet their official obligations, even if only in a broad sense. It may no longer identify specific legal statutes and professional standards like PAS 197 due to its enlarged European scope, but regulatory compliance remains a prominent theme.<sup>336</sup> Observing the demands of applicable legislation is a particular priority of BS 17820. Its general principles and its four constituent policies all contain provisions to this effect, collectively ensuring that legal requirements are a central consideration in the development of operational collections policy. This thorough treatment of legal issues is especially relevant to the Armouries, as it is required to reconcile its primary institutional commitments under the *National Heritage Act 1983* with the considerable demands of weapons law.<sup>337</sup> But again, BS 17820 prioritises a general commitment to legality over the content of particular laws. The Armouries' registrar staff are therefore responsible for identifying its unique legislative obligations as the national museum of arms and armour, so as to wholly incorporate them into the collections policy structure provided by BS 17820. Beyond satisfying the relevant legal requirements, it also advocates that institutional policy should be consistent with current best practice in collections management. While the only standard BS 17820 specifically references is

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<sup>334</sup> British Standards Institution, *BS 17820*, p. 11.

<sup>335</sup> Bell, interview, 24 March 2022, p. 1.

<sup>336</sup> British Standards Institution, *BS 17820 Tracked Changes*, pp. 31-38; British Standards Institution, *PAS 197*, pp. 25-32.

<sup>337</sup> Robson, interview, 1 April 2022, pp. 3-4.

Spectrum (as a suitable cataloguing benchmark), elsewhere it asserts that all of the provisions have been designed to complement existing regulations and codes in the field.<sup>338</sup> Much of the value of BS 17820 thus lies in its coordination of the diverse legal and professional structures that govern museums, articulated in a format that individual museums can apply to their collections policies. When institutional operations are subject to a regulatory assemblage as complex as that of the Armouries, any assistance in mastering its multifaceted interactions is beneficial. The direct impact of BS 17820 on the control of weapons collections may thus be relatively limited, but it acts as a key mechanism for bringing other prominent frameworks into alignment with one another.

BS 17820 is a peculiar standard, at least in its implications for museum weapons holdings. Nowhere does it explicitly regulate these objects, as its provisions only apply to them in a general sense. Nor does it directly determine the routine management of museum objects of any kind, as its overt policy focus places it at a remove from everyday operations. In spite of these qualifications, BS 17820 still exerts considerable influence over the Armouries' current treatment of its weapons collections. Isolating the contribution of any single framework to institutional practice is not straightforward, yet it is evident that it informs both the structure and substance of its collections policies. BS 17820 represents an advance on PAS 197 in many ways, as its provisions are clearer, broader in scope, and more accessible to a non-specialist audience.<sup>339</sup> They express the prevailing professional standards that the Armouries should incorporate into its operational policy and procedure. BS 17820 thus provides the underlying framework that informs the approach of its registrar staff to collections management at all levels. Of course, any development of its institutional collections policy equally affects all objects in its custody. Where BS 17820 does place additional burdens on the use of the Armouries' weapons collections, it stems from the need to apply its provisions proportionally. The risks presented by weapons are greater than most other objects, so it follows that the Armouries is obliged to implement further safeguards to satisfy the standard.<sup>340</sup> These range from the pursuit of a risk-managed approach to the delivery of dedicated training in weapons management. The provisions of BS 17820 for collections care as well as collections access reinforce the urgency of finding a suitable balance between the competing demands of risk mitigation and public engagement. In this

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<sup>338</sup> British Standards Institution, *BS 17820*, pp. 4, 16.

<sup>339</sup> Kaines, interview, 9 May 2022, pp. 12-13.

<sup>340</sup> Adams, p. 114.

sense, these conditions hardly constrain access to the Armouries' weapons collections. It is more useful to instead frame them as operational guidance to facilitate this process.<sup>341</sup> Overall, the relevance of BS 17820 to the management of the Armouries' weapons holdings is more strategic than practical. Its constant integration of legislation and professional standards into an institutional policy template helps museums to work through their various obligations. It may leave the task of negotiating the demands of weapons law and museological practice to the Armouries, but it does equip its registrar staff with a framework to accommodate these intricate structures. In this way, BS 17820 aligns with the ideas of assemblage theory. Echoing Sharon Macdonald's focus on the myriad entanglements of heritage process, it directs museums to consider all possible influences on collections management when formulating institutional policy.<sup>342</sup> Given the complex set of regulations governing the use of weapons in museum programming, the formulation of collections policy at the Armouries has to be especially meticulous.

### **Setting the Standard: Museum Accreditation**

The Museum Accreditation Scheme (MAS) is one of the foremost national frameworks regulating museum practice. As of November 2023, over 1,700 museums across the UK held Full or Provisional Accreditation, with all three of the Armouries' venues being fully accredited.<sup>343</sup> This figure becomes even more impressive when its criteria are consulted. To become an accredited museum, it is necessary to demonstrate exemplary levels of professional conduct across a range of areas, including collections stewardship. Collections have been a priority of MAS since its inception. Launched in 1988 as the Museum Registration Scheme, one of its initial requirements was the 'publication of an acceptable statement of collections management policy' covering acquisition, disposal, inventory, documentation, and conservation.<sup>344</sup> It has undergone many revisions in the intervening years – it is now the Museum Accreditation Scheme and its administration has been devolved to the four nations of the UK – but it has retained a strong collections focus throughout. Three out of nine of the current standard's major benchmarks directly

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<sup>341</sup> Robson, interview, 1 April 2022, p. 4.

<sup>342</sup> Macdonald, p. 118.

<sup>343</sup> Arts Council England, *List of Accredited Museums in the United Kingdom, Channel Islands, and the Isle of Man* (London: Arts Council England, 2023).

<sup>344</sup> Christopher Newbery, 'Museums and Galleries Commission (MGC): New Initiatives', in *Collections Management for Museums: Proceedings of an International Conference*, ed. by D. Andrew Roberts (Cambridge: Museum Documentation Association, 1988), pp. 209-13 (pp. 210-11).

address collections.<sup>345</sup> MAS is thus a key component of the regulatory assemblage that controls access to the Armouries' holdings. It has good reason to observe these terms, as being a fully accredited museum confers considerable benefits. Besides the increased prestige that comes with accreditation, most public sector and charitable funding streams are only available to accredited museums.<sup>346</sup> The threat of professional censure is never far away either. If an institution fails to meet its standard requirements of MAS, they may lose their accredited status entirely.<sup>347</sup> Being expelled from the scheme would be detrimental to any museum, as they would suffer considerable reputational damage as well as the loss of extra financial support. As an institution heavily invested in MAS, the Armouries has every incentive to comply with its provisions. These are articulated in two stages. The Accreditation Standard provides a broad overview of its conditions, while a supplementary guidance document gives detailed practical recommendations for their implementation.<sup>348</sup> By examining their contents alongside one another, it is possible to discern the role of the accreditation process in shaping the routine management of the Armouries' collections. Having established the operational jurisdiction of MAS, the next step is to examine the nature of any constraints it places on museum weapons collections. After all, the elevated threat they pose to public safety surely warrants higher standards of management than the norm.

The first of the accreditation standards that shapes weapons management at the Armouries does not exclusively address collections. Instead, it concerns risk mitigation whose operational ramifications extend far beyond collections matters. MAS instructs the Armouries' registrar staff to arrange a thorough assessment of its security systems:

You should get security advice for all the buildings and sites that the museum occupies. You should do this at least every five years, and the advice should cover:

- arrangements for your staff, volunteers and visitors
- your stored and displayed collections
- your buildings and sites

The advice should be proportionate to the size, scope, vulnerability and value of your museum and collections.<sup>349</sup>

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<sup>345</sup> Museum Accreditation, *Accreditation Standard*, pp. 6-8.

<sup>346</sup> Candlin and others, p. 63.

<sup>347</sup> Arts Council England, *Terms and Conditions for the Accreditation Scheme for Museums and Galleries in the United Kingdom: Accreditation Standard* (London: Arts Council England, 2019), p. 3.

<sup>348</sup> Museum Accreditation, *Accreditation Guidance*, p. 3.

<sup>349</sup> Museum Accreditation, *Accreditation Standard*, p. 5.

A prominent feature of this formulation is its indiscriminate nature. It does not specify any particular conditions for weapons, or any other object type for that matter. Instead, like BS 17820, its influence over weapons collections primarily derives from its espousal of a ‘proportionate’ approach. As the Armouries possesses extensive holdings of these challenging objects, its security arrangements are assessed more stringently under MAS. Beyond the general measures required of all accredited museums, the Armouries must prove that its facilities and procedures are appropriate to the threat presented by weapons collections.<sup>350</sup> By passing this regular inspection, it is deemed to be adequately mitigating the associated risks. Not only is the content of this security review informed by the Armouries’ weapons holdings, but the same also applies to the assessor. The Accreditation Guidance clarifies that the source of institutional security advice should correspond to potential collection risks.<sup>351</sup> As well as the routine security assessment by the accreditation staff, the Armouries has its premises inspected by the MSPA every five years.<sup>352</sup> There are two reasons for this further check: the MSPA’s oversight for the security of all national museums (as seen earlier in the chapter) and the heightened threat posed by its weapons holdings. The institutional focus of this review complements the breadth of the Accreditation Standard, applying its security provisions to the Armouries’ particular situation. But the use of individual assessment by MAS does leave this process open to a degree of interpretation. The absence of any explicit textual reference to weapons collections means that the focus of these security visits can vary in practice depending on the assessor.<sup>353</sup> This makes it difficult for the Armouries’ registrar staff to predict its security obligations under MAS with absolute certainty. But this essentially becomes a moot point when the legal demands of the wider regulatory assemblage are recalled. The Armouries’ maintenance of both firearms and explosives licences also entails routine inspection by its enforcing authorities. Given the stringent nature of the security arrangements specified by weapons law, there is very little that MAS can add. Yet, the accreditation process does offer another valuable opportunity for the Armouries to review its security arrangements at regular intervals. Public access to its weapons collections would be unthinkable without a proven security regime in place.

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<sup>350</sup> Bell, interview, 24 March 2022, p. 8.

<sup>351</sup> Museum Accreditation, *Accreditation Guidance*, pp. 38-39.

<sup>352</sup> Kaines, interview, 9 May 2022, pp. 7-8.

<sup>353</sup> Bell, interview, 24 March 2022, pp. 8-9; Kaines, interview, 9 May 2022, p. 9.

In comparison, the Accreditation Standard dedicates an entire chapter to best practice in collections management. The first of its benchmarks that addresses the use of museum objects, maintaining relevant collections information, stipulates two criteria: an approved documentation policy and observation of the Spectrum primary procedures.<sup>354</sup> The policy requirements for documentation under MAS affect the Armouries' weapons collections in a similar way to the equivalent provisions in BS 17820. A compliant institutional framework should ensure that collections documentation meets 'ethical commitments and legal requirements', without elaborating on what these entail.<sup>355</sup> This is the nearest acknowledgement here that certain collection types might have distinct information needs. Any terms specific to weapons in the Armouries' documentation policy thus originate from internal processes rather than being a demand of MAS.<sup>356</sup> In conjunction with these policy requirements, MAS designates a minimum benchmark for documentation practice. It draws on the existing Spectrum cataloguing standards to this end, integrating its primary procedures into the accreditation requirements on the grounds that they are 'essential for managing collections effectively and making them accessible'.<sup>357</sup> While these are both key criteria for the continued existence of public weapons collections, MAS again makes no specific provision for individual object types. It lists the procedures that the Armouries is required to implement – object entry, acquisition and accessioning, location and movement control, inventory, cataloguing, object exit, loans in, loans out, and documentation planning – but provides no direction as to how these might address the unique situation of its weapons collections.<sup>358</sup> This is not surprising, as this clause has to cover all conceivable collection types in limited space. The co-option of another established framework is advantageous in this sense, as its provisions treat the subject in much greater depth. Spectrum is a major standard in its own right whose influence over collections documentation extends far beyond its brief citation in MAS.<sup>359</sup> Unusually, it does mention weapons within its primary procedures in a single instance. Its guidance on Location and Movement Control advises that a risk assessment conforming to the relevant legislation should be recorded to determine the

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<sup>354</sup> Museum Accreditation, *Accreditation Standard*, p. 7.

<sup>355</sup> Museum Accreditation, *Accreditation Guidance*, p. 51.

<sup>356</sup> Bell, interview, 24 March 2022, pp. 4-5.

<sup>357</sup> Museum Accreditation, *Accreditation Standard*, p. 7.

<sup>358</sup> Museum Accreditation, *Accreditation Guidance*, p. 53.

<sup>359</sup> Lambert, interview, 23 February 2023, p. 10; Elizabeth Shepherd and Rachael Pringle, 'Mapping Descriptive Standards Across Domains: A Comparison of ISAD(G) and SPECTRUM', *Journal of the Society of Archivists*, 23 (2002), 17-34 (pp. 20-21).

appropriate operational requirements for firearms.<sup>360</sup> Although this measure is only a suggestion, its incorporation into MAS as a Spectrum primary procedure gives it greater impetus. Documented risk assessments are a standard feature of weapons management at the Armouries when determining appropriate access arrangements to its restricted collections.<sup>361</sup> These professional standards have surely encouraged its institutional adoption. The specific impact of these documentation benchmarks on the regulation of weapons collections is relatively modest overall. It is nonetheless important for the Armouries' registrar staff to fulfil all of its obligations, however minor they may seem.

MAS then shifts its attention to the ability of museums to conserve and care for their collections. The structure of this section mirrors that of collections information, requiring a policy document and a plan that both meet high standards of collections care. On the policy side, applicants are again asked to prove their compliance with 'ethical commitments and legal requirements' in the delivery of collections care.<sup>362</sup> Otherwise, this section does not further constrain the use of weapons or any other specific collections. This supports the judgement that object type is largely immaterial under MAS if an institution can demonstrate its adherence to the relevant legislation.<sup>363</sup> Exempting the demands of weapons law, nothing here distinguishes the treatment of the Armouries' holdings from any other museum collection. By contrast, the requirements for the care and conservation plan are more targeted in their impact. A national museum should outline the needs of vulnerable items in the collection, the process for identifying major collections threats, and 'appropriate' storage arrangements.<sup>364</sup> Weapons may not be mentioned by name, but the content of this section signals that accredited museums must have suitable measures in place to safeguard sensitive objects in their possession. The Armouries' weapons collections are no exception. Another interesting feature of the approach taken by MAS to collections care is its interaction with the corresponding requirements for public access. One of the conditions for meeting this accreditation standard is an approved access policy that covers visitor engagement with institutional collections.<sup>365</sup> It follows much the same pattern as its policy provisions for collections

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<sup>360</sup> Collections Trust, 'Location and Movement Control - Suggested Procedure' <<https://collectionstrust.org.uk/resource/location-and-movement-control-suggested-procedure/>> [accessed 24 May 2022].

<sup>361</sup> Robson, interview, 1 April 2022, p. 8.

<sup>362</sup> Museum Accreditation, *Accreditation Standard*, p. 8.

<sup>363</sup> Kaines, interview, 9 May 2022, p. 5.

<sup>364</sup> Museum Accreditation, *Accreditation Guidance*, p. 58.

<sup>365</sup> Museum Accreditation, *Accreditation Standard*, p. 9.



information and collections care. For example, it features an identical formulation on meeting ethical and legal requirements as these other sections. Crucially, it also requires accredited museums to address the following issue in their policy framework: ‘How will you balance the care and management of collections against provision of access.’<sup>366</sup> This clause further reinforces the Armouries’ obligation to reconcile the distinct needs of its collections and its audiences, a theme that recurs throughout the museological apparatus – from the *National Heritage Act 1983* to BS 17820. However, like these other governance structures, MAS provides no further guidance as to how museums should actually achieve this in practice. It is left to the Armouries’ registrar staff once again to strike this delicate balance, whose work is only made more difficult by the legal controls governing its weapons holdings. The repeated allusions to this tension emphasise the extent to which these various frameworks overlay one another to form an overarching regulatory assemblage. From this broader perspective, the accreditation standards for collections care and access ultimately place few constraints on the use of the Armouries’ weapons collections that are not already anticipated elsewhere.

Overall, MAS has a measured impact on the ability of the Armouries to use its weapons holdings in public programming. Its requirements for collections information, collections care, and collections access follow standard practice, hardly distinguishing weapons from any other museum holdings. Its provisions on risk management are most pertinent to the Armouries’ situation, enforcing the rigorous inspection of its security arrangements in proportion to perceived threat of its weapons collections. Consistent in its holistic approach, however, the accreditation standards do not specify the precise form of these measures. This is the inevitable compromise involved in balancing sector relevance with institutional applicability.<sup>367</sup> The Armouries’ registrar staff are ultimately responsible for ensuring its collections practice complies with MAS, much like BS 17820. This comparison is worth developing further given their close resemblance in structure and operation. These frameworks function at a strategic level rather than addressing the intricacies of routine collections management. Both are designed to be applicable across the museum sector, generally treating all collections alike. Where they do acknowledge the needs of certain objects, they utilise a language of proportion to keep their provisions as inclusive as possible.<sup>368</sup> Yet, the application of MAS to the

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<sup>366</sup> Museum Accreditation, *Accreditation Guidance*, p. 61.

<sup>367</sup> Museum Accreditation, *Accreditation Standard*, p. 2.

<sup>368</sup> Mendoza, p. 15.

Armouries' weapons collections does differ from BS 17820 in a few notable respects. The former is enforced with greater rigour, as accredited institutions are reassessed every five years under normal circumstances. In January 2023, the Armouries passed its latest accreditation return covering all three of its sites.<sup>369</sup> MAS thus provides another layer of accountability for its approach to weapons management, subsumed into a holistic institutional review. The accreditation standards are also more active in their use of other regulatory structures to augment their own guidance. Its emphasis on museums observing the relevant 'legal requirements' and 'ethical commitments' during their collections activities may be a familiar refrain, but the co-option of related professional advice by MAS is more systematic. Its integration of the Spectrum primary procedures as the benchmark for collections information, for example, addresses this field far more thoroughly than it could alone. Likewise, its recommendation that accredited museums with higher-risk collections should receive routine inspections from the MSPA bolsters the integrity of its security provision. MAS situates the Armouries' weapons collections within a wider professional discourse around museum work that harnesses networks of individuals, objects, and documentary infrastructures.<sup>370</sup> Best practice in collections management is a product of exchange, so accredited museums must consider how its requirements interact with other affiliated regulatory structures. The task facing the Armouries' registrar staff is remarkable in that they have to accommodate the weighty obligations of weapons law alongside these interdependent museological benchmarks.

### **Safeguarding Cultural Exchange: Loan Protocols**

A key strategy that museums use to maximise the public reach of their collections is to lend them to other institutions. The Armouries is no different in this respect, operating an extensive loans programme as a central component of its public access strategy.<sup>371</sup> In recognition of the distinct challenges of lending and borrowing cultural objects, specific frameworks have been developed to smooth the complex institutional exchanges involved. In the British context, the chief mechanism designed to facilitate museum loans is the Government Indemnity Scheme (GIS). Operated by ACE under the overall direction of DCMS, its principal purpose is to make it possible for cultural institutions

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<sup>369</sup> Bell, interview, 24 March 2022, p. 9; Arts Council England, *List of Accredited Museums*.

<sup>370</sup> Rex, p. 195.

<sup>371</sup> Board of Trustees of the Royal Armouries, *Annual Report and Accounts 2021-22*, pp. 21-22.

to lend objects by underwriting the financial liability present in all loan arrangements.<sup>372</sup> This government involvement emphasises a distinguishing feature of this framework, its legal underpinnings. The origins of GIS in Section 16 of the *National Heritage Act 1980* set it apart from most other museological frameworks.<sup>373</sup> Neither BS 17820 nor MAS are rooted in law. It increases the Armouries' capacity to provide access to the national collection of arms and armour through loans, as stipulated by the *National Heritage Act 1983*. While its provisions are largely framed in affirmative terms, the 1980 Act does contain an important caveat. All loans made under GIS must observe any conditions approved by the Secretary of State to mitigate the additional risks involved during this process.<sup>374</sup> Participating museums must follow certain guidelines to ensure the integrity of all applicable objects at various stages of the loans process. Any institution wishing to utilise GIS has to meet a range of security, environmental, and transport conditions that are updated periodically.<sup>375</sup> The Armouries routinely accepts these terms when it borrows objects from elsewhere, as DCMS only approves the use of commercial insurance in very limited circumstances given its expense. When the Armouries' collections are lent to another institution, however, its status as a national museum means these provisions are always enforced. Even though the national collection cannot be indemnified under this scheme due to their designation as public property, its objects remain subject to the same borrowing conditions.<sup>376</sup> Ultimately, the Armouries cannot lend any of its holdings – weapons or otherwise – if a prospective borrower cannot meet the GIS conditions. The heightened risk posed by its weapons collections further complicates this process. The Armouries' registrar staff are required to cross-reference the security and transport provisions of GIS with the corresponding demands of weapons law when arranging loans.<sup>377</sup> Reconciling these two distinct frameworks is not always straightforward in practice, especially as the resulting arrangements have to be negotiated with other museums. Their intersection essentially determines the ability of the Armouries to share its weapons collections with new institutions and audiences.

The first set of conditions prescribed by GIS addresses the security standards of a prospective venue. These are more extensive than the equivalent MAS requirements.

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<sup>372</sup> Collections Trust, 'Government Indemnity Scheme'

<<https://collectionstrust.org.uk/resource/government-indemnity-scheme/>> [accessed 26 July 2023].

<sup>373</sup> *National Heritage Act 1980*, c. 17 (London: HMSO), pp. 9-11.

<sup>374</sup> *National Heritage Act 1980*, p. 10.

<sup>375</sup> Matassa, *Museum Collections Management*, pp. 52-53.

<sup>376</sup> Arts Council England, *Government Indemnity Scheme: Guidelines*, p. 57.

<sup>377</sup> McKnight, interview, 22 February 2023, p. 11.

Annex D of the Indemnity guidelines stipulates no fewer than twenty-one distinct provisions, encompassing fire detection, staff invigilation, environmental monitoring, and display conditions.<sup>378</sup> Their specification is also much more precise. An acceptable alarm system, for example, must be fitted by an industry-approved contractor, cover all routes into the venue, be maintained in good working condition, and be serviced twice annually.<sup>379</sup> This specificity makes it clearer for museum staff to implement appropriate measures. While the security provisions of GIS are better defined than those conveyed by other museological frameworks, they still do not refer to the particular demands of weapons collections.<sup>380</sup> On the whole, they are treated no differently to other objects under these terms. A few of its clauses appear nonetheless to place heavier burdens on weapons loans, even if they are not mentioned directly. One of the GIS security entries states that any ‘building must also provide appropriate control for the indemnified object’.<sup>381</sup> Given the elevated security threat posed by weapons, the level of ‘appropriate control’ will be higher than the norm. All institutions are thus encouraged to reinforce the fabric of their buildings if they wish to accept weapons loans under GIS. This is less of a burden for the Armouries, as it already observes the stringent building parameters required by its firearms and explosives licences.<sup>382</sup> Its adherence to weapons law again more than satisfies the corresponding museological standard. Another consequence of the absence of weapons from the GIS security conditions is that individual museums must apply them to their own situation. Paragraph 12 of Annex D details the minimum specification of lockable display case required to exhibit ‘small portable objects’ – anti-bandit laminated glazing at least 11.3mm thick, or Acrylic or Perspex thicker than 12mm.<sup>383</sup> Although this clause singles out ‘especially valuable’ objects like jewellery or coins, it could also apply to a handgun or a knife depending on its interpretation. As this point is debatable in practice, it is prudent for all institutions to use a higher standard of display case as a precaution when borrowing such items. The Armouries is more than prepared to meet these conditions. As with building integrity, its case specification is already stipulated by its weapons licences, which surpasses the GIS requirements.<sup>384</sup> In meeting its legislative duties, the Armouries’ registrar staff satisfy even the strictest

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<sup>378</sup> Arts Council England, *Government Indemnity Scheme: Guidelines*, pp. 78-80.

<sup>379</sup> Arts Council England, *Government Indemnity Scheme: Guidelines*, p. 78.

<sup>380</sup> Kaines, interview, 9 May 2022, p. 15.

<sup>381</sup> Arts Council England, *Government Indemnity Scheme: Guidelines*, p. 78.

<sup>382</sup> Bell, interview, 24 March 2022, p. 10.

<sup>383</sup> Arts Council England, *Government Indemnity Scheme: Guidelines*, p. 79.

<sup>384</sup> Robson, interview, 1 April 2022, p. 6.

interpretation of its display conditions. It must be reiterated that GIS is designed to cover any object that could be loaned by a museum, so it is understandable that it does not specify particular safeguards for weapons collections. Ultimately, this broad scope combined with the strength of weapons law means that its codified security provisions create few additional burdens during institutional preparations for weapons loans.

Acknowledging that the necessary safeguards for loans vary between museum collections, the security conditions under GIS are supplemented by a process of individual assessment. As with accreditation, ACE delegates this responsibility to the MSPA, who is authorised to ‘make further recommendations in individual cases’.<sup>385</sup> This tailored oversight has greater influence over the Armouries’ approach to weapons loans, as both a lender and a borrower. The MSPA is responsible for establishing the security credentials of all potential borrowing venues under GIS, as is also advised under the terms of MAS. As such, they effectively act as the arbiter for all indemnified loans, determining the appropriate safeguards in light of the objects an institution seeks to borrow. If the MSPA was ever dissatisfied with the Armouries’ security apparatus on inspection, they could prevent it from borrowing indemnified weapons entirely.<sup>386</sup> The continuation of its institutional loans programme thus depends on the accommodation of this expert guidance. Moreover, the MSPA plays just as significant a role in shaping the Armouries’ lending arrangements as its borrowing ones. All loans from the national collection must receive their official approval before going ahead.<sup>387</sup> The individual assessment of every outward loan from the Armouries means that the security needs of each particular object are integral to this evaluation. Central to the authorisation process is the appraisal of the prospective loan venue, which is a joint undertaking. The Armouries’ registrar staff request a detailed overview of the borrowing institution’s sites and procedures, which they forward to the MSPA to make the final decision.<sup>388</sup> They must follow this process for all loan requests, but the security requirements are correspondingly higher when the Armouries’ weapons collections are involved. Hence, the stipulation made by the MSPA that its firearms should always be cabled down when loaned out to mitigate the increased risk associated with a less secure venue. This working partnership has generally enabled the circulation of the Armouries’ weapons

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<sup>385</sup> Arts Council England, *Government Indemnity Scheme: Guidelines*, p. 18.

<sup>386</sup> Bell, interview, 24 March 2022, p. 10.

<sup>387</sup> ICOM UK, 'Managing Risk to Objects' <<https://uk.icom.museum/resource/managing-risk-to-objects/>> [accessed 27 April 2023].

<sup>388</sup> Robson, interview, 1 April 2022, p. 6.

collections, but they have had to turn down certain loan requests on security grounds. This has primarily occurred when the borrowing institution has not been able to secure an appropriate licence to possess a specific article.<sup>389</sup> But there is always the possibility that the MSPA could stop a loan under their own authority as an acknowledged security expert. This is one of the few situations where a museological framework can actively prevent public access to the Armouries' weapons collections, albeit one that is unlikely to transpire. It also represents another instance where weapons law and museological standards intersect to form the regulatory apparatus governing museum weapons collections. The MSPA is undoubtedly a central actor in this assemblage given their role in reviewing the Armouries' security provisions as a national museum, as an accredited museum, and as a participant in GIS. Given the robust system of oversight surrounding its institutional operations, the Armouries must ensure that all engagement with its weapons collections occurs within a secure environment, be it internal or external.

GIS devotes similar attention to the safe conduct of loans between museums, imposing a number of conditions on the transport of objects borrowed under its terms. The need to implement proper safeguards at this vulnerable stage of the lending process was apparent from its inception. The *National Heritage Act 1980* states that government indemnification encompasses the period when objects are 'being taken to or returned from' the loan venue, enshrining the principle of 'nail to nail' cover.<sup>390</sup> In order to reduce the additional liability generated by this extended period of protection, GIS requires that all participating institutions adopt certain precautions when objects are in transit. Mirroring the provisions for venue security, Annex E of the Indemnity Guidance addresses a range of issues: the use of experienced companies, the demands of overseas shipping, rigorous supervision arrangements, detailed vehicle specifications, trained couriers, and diligent operational procedures during transit.<sup>391</sup> As with most collections management frameworks, however, these 'general' conditions are designed to apply to any object a museum could conceivably lend. The GIS transport provisions do not cater to the needs of particular collections, even those that pose an increased security threat. Weapons are thus absent from its terms, requiring the Armouries to determine the extra precautions needed to meet its legal obligations, maintain its institutional reputation,

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<sup>389</sup> McKnight, interview, 22 February 2023, p. 5.

<sup>390</sup> *National Heritage Act 1980*, p. 11.

<sup>391</sup> Arts Council England, *Government Indemnity Scheme: Guidelines*, pp. 81-83.

and assuage public expectations.<sup>392</sup> Moreover, unlike the GIS security conditions, there are no clauses that even require the observation of appropriate or proportional controls for the transit of weapons loans. The transport requirements for indemnified loans apply uniformly, regardless of the additional risks an individual object may pose. Yet, their overall rigour actually renders targeted provisions unnecessary on a practical level. In most cases, the GIS transport standards are considered robust enough to mitigate the heightened risks involved in transporting weapons.<sup>393</sup> Further controls specific to weapons collections would essentially be surplus to requirements. In any case, the transportation of certain high-risk weapons is subject to legal regulation. Every time the Armouries transports a Section 5 prohibited firearm, for example, it is legally required to use an agent approved by the Home Office for this purpose.<sup>394</sup> For a firm to receive this authorisation, it must demonstrate many of the same qualities specified by the GIS transport conditions: experienced staff, rigorous security, robust vehicle specifications, constant supervision, and established contingencies.<sup>395</sup> In meeting the transport provisions of weapons legislation, the Armouries simultaneously satisfies its obligations under the Indemnity Guidelines. When read alongside one another, weapons law and the GIS transport conditions thus establish the benchmark for the secure transit of museum weapons collections. It is the duty of the Armouries' registrar staff to negotiate these two overlapping frameworks in the coordination of its loans programme.

Overall, the museological apparatus governing loans has an uneven impact on the external circulation of the Armouries' weapons collections. The GIS guidelines themselves do not place many further demands on operational practice. Although its venue security and transport provisions are characterised by greater specificity than other museological frameworks, these govern the Armouries' weapons holdings in the same manner as any other museum collection. As long as these general standards can be met – assisted by their marked crossover with relevant legal obligations – its registrar staff are able to arrange weapons loans for the benefit of new audiences. The MSPA then tailors this framework to the Armouries' unique circumstances. Their extensive role in approving its individual loans empowers the position holder to stipulate further

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<sup>392</sup> Kaines, interview, 9 May 2022, p. 17.

<sup>393</sup> Robson, interview, 1 April 2022, p. 7.

<sup>394</sup> Home Office, *Firearms Licensing Law*, p. 140.

<sup>395</sup> Home Office, *Firearms Security Handbook*, pp. 26-28.

measures that specifically address the needs of its weapons collections.<sup>396</sup> In practice, the MSPA and the Armouries actively work together to determine the appropriate level of security during this process. The complete refusal of a loan is accordingly a very rare occurrence, even allowing for the heightened risks involved in transferring weapons.<sup>397</sup> In effect, the conditions governing external access to museum weapons collections are established more by negotiation than imposition. However, these robust museological frameworks are not the only factors at work. Loans are one of the few occasions that museum objects leave their home institution, so their success often relies upon a greater range of actors. Given the sensitivities surrounding weapons, the participation of additional parties increases the likelihood of complications. This is apparent in the Armouries' use of transport agents, who can be reluctant to assume the risks involved. Its registrar staff have had difficulty securing the acquisition of weapons from overseas, for example, because they have been unable to find a willing courier at a justifiable cost.<sup>398</sup> The Armouries is effectively beholden to shipper discretion in this matter, as it does not possess the capacity to routinely transport its weapons collections to other institutions. One of the greatest potential barriers to its loan programme thus stems from a prosaic lack of transport rather than any regulatory apparatus. It is an important reminder of the interconnected and contingent nature of museum practice.<sup>399</sup> If no viable transport agents are comfortable with conveying weapons in a given instance, then the Armouries cannot lend them irrespective of its compliance with the prevailing official frameworks. It is not always possible to anticipate every obstacle to the use of weapons collections in museum programming. In the case of institutional weapons loans, the Armouries' registrar staff often have to work through these issues with other actors as part of the organisation process. The parameters of the codified regulatory assemblage thus do not always necessarily represent the whole picture.

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<sup>396</sup> UK Registrars Group, 'Meet the ACE Security Team' <<https://www.ukregistrarsgroup.org/blog/meet-the-ace-security-teamvalentina-sabucco-manager-security-and-protection-advice-for-ace-will-join-us-to-introduce-herself-and-the-work-of-the-security-team-speaking-on-their-processes-and-answe/>> [accessed 1 August 2023].

<sup>397</sup> Kaines, interview, 9 May 2022, pp. 15-16.

<sup>398</sup> Robson, interview, 1 April 2022, p. 10.

<sup>399</sup> Morse, Rex, and Richardson, p. 117.



### **Disentangling the Regulatory Assemblage**

Together, these respective museological frameworks play a significant if nebulous role in governing engagement with the Armouries' weapons collections. The first major theme of this regulatory apparatus is the preponderance of a strategic approach. From the *National Heritage Act 1983* to MAS, the prevailing operational frameworks mostly focus on informing high-level institutional policy rather than the minutiae of everyday practice. GIS represents the main exception to this trend, given the detail of its security and transport conditions.<sup>400</sup> The all-embracing nature of these governance structures also characterises their treatment of different institutional collections. In pursuit of general applicability across the sector, they rarely consider specific object types. The prevalence of this non-disciplinary approach means that these frameworks only mention weapons in isolated instances, and even then, mainly in passing. They often do address the needs of these objects, just in a more implicit fashion. In many areas, standard museum practice in collections management is rigorous enough for weapons.<sup>401</sup> Any further conditions would be superfluous. Where weapons are seen to require additional safeguards – namely the fields of security and risk management – these are anticipated by proportional formulations. Individual museums are expected to understand the needs of their collections and apply the relevant standards accordingly. Thus, the Armouries itself is responsible for ascertaining its obligations under these various frameworks in relation to its weapons holdings.<sup>402</sup> Its registrar staff perform much of the groundwork. This involves regular communication with key enforcement authorities – DCMS, ACE, the MSPA – to ensure their assessments are consistent. Otherwise, misunderstandings may occur that could result in unintentional non-compliance if left unchecked. The challenge of establishing a definitive approach to weapons management in museums evokes a deeper issue of synthesis. All of the museological frameworks examined here address in some form the fundamental dilemma of reconciling the competing needs of public access on the one hand with collections care and security on the other.<sup>403</sup> However, with the partial exception of GIS, they do not provide detailed practical guidance for museums to actually achieve this end. Again, it is the responsibility of the Armouries' registrar staff to strike this balance. The concept of balance is integral to

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<sup>400</sup> Arts Council England, *Government Indemnity Scheme: Guidelines*, pp. 78-83.

<sup>401</sup> Robson, interview, 1 April 2022, pp. 7-8.

<sup>402</sup> Bell, interview, 24 March 2022, pp. 1-2.

<sup>403</sup> Simmons, 'Collection Care and Management', p. 240.

modern collections practice: ‘Successful collections management is about balance, the balance between access and preservation, between the needs of collections and the people who use them and between short, medium and long term priorities.’<sup>404</sup> This chapter has shown it is also about balancing the distinct expectations of museums, professional bodies, and government agencies. The inclusion of weapons and their additional legal controls only serves to complicate these delicate negotiations.

In keeping with the guiding methodology, these museological frameworks are key components of the complex regulatory assemblage that governs access to the Armouries’ weapons collections. Firstly, there are numerous connections between them. Whether it is MAS and GIS harnessing the expertise of the MSPA, or BS 17820 and MAS referencing Spectrum in their provisions, these structures draw on one another for mutual reinforcement.<sup>405</sup> This is advantageous for museum staff seeking to observe general standards of best practice throughout their duties, as it somewhat mitigates the complications arising from duplication or contradiction. It is especially beneficial for institutions like the Armouries whose operations are also governed by a sprawling legislative apparatus.<sup>406</sup> Indeed, these standards acknowledge the importance of legal compliance through their regular appeals to obey applicable laws across various aspects of museum practice. They may not reference particular legislation in their pursuit of general applicability, but they do serve to emphasise the Armouries’ duties under weapons law. There is even considerable synergy between the relevant legal and governance frameworks. The conditions observed by the Armouries to maintain its weapons licences regularly satisfy professional best practice in collections management and vice-versa.<sup>407</sup> The assemblage is not necessarily as disparate as it may appear. This is not to say, however, that the coexistence of these various regulatory structures is completely harmonious. Weapons law and museum governance structures exist for very different reasons, so it is unsurprising that their impact on the Armouries’ access arrangements also varies. The former has been developed to mitigate the perceived threat of weapons to public safety, while the latter support museum programming by outlining aspirational standards of practice for individual institutions.<sup>408</sup> Where one

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<sup>404</sup> British Standards Institution, *PAS 197*, p. 1.

<sup>405</sup> UK Registrars Group, ‘Meet the ACE Security Team’; British Standards Institution, *BS 17820*, p. 16; Museum Accreditation, *Accreditation Standard*, p. 7.

<sup>406</sup> Royal Armouries, *Collections Policy Framework*, p. 3.

<sup>407</sup> McKnight, interview, 22 February 2023, p. 4.

<sup>408</sup> Hill, p. v; Gray and McCall, p. 24.

works to constrain access, the other endeavours to enable it. This is reinforced by their respective approaches to weapons management: the prevailing legislation primarily dictates what the Armouries cannot do with these objects, whereas the museological guidelines specify what it should do to utilise all collections effectively, including restricted ones. The different priorities of these frameworks also cause them to address distinct aspects of the stewardship of museum weapons collections. The museological standards are effective in establishing robust professional parameters for collections management in general, but largely omit the specific needs of weapons. In contrast, weapons law provides detailed controls on weapons in their many manifestations but does not often distinguish collections of cultural significance. Any overlap between the two is generally coincidental. Access to museum weapons collections is determined by the intersection of these two rather incongruent sets of regulatory frameworks, neither of which fully addresses their unique situation. While this disconnection is simple to identify, it requires much greater thought and effort to resolve in practice.

One of the many duties of the Armouries' registrar staff is to assure institutional compliance with these overlapping legal and professional frameworks (see Figure 1). They are not helped by the fact that there is little guidance to support the reconciliation of these distinct structures. Out of all the regulatory structures examined over the last two chapters, only three address the specific challenges of managing museum weapons collections in any great depth (though often with significant caveats). First, there are the sections of weapons law that explicitly concern museums, such as the Museum Firearms Licence or their exemptions from offensive weapons legislation.<sup>409</sup> While these legal provisions do establish the broad parameters governing access to weapons in museums, they rarely give detailed practical direction. Second, there are the guides produced by the Home Office on firearms licensing and firearms security, which include chapters dedicated to clarifying the legal obligations of museums in these areas.<sup>410</sup> However, their scope is confined to firearms control rather than weapons management in general and some of the information on the museum sector printed in the Firearms Security Handbook is concerningly outdated. The third authority on the unique needs of museum weapons collections is the MSPA, whose expertise derives from extensive first-hand

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<sup>409</sup> *Firearms (Amendment) Act 1988*, p. 11; *Criminal Justice Act 1988*, pp. 96-97; *Offensive Weapons Act 2019*, pp. 39-43.

<sup>410</sup> Home Office, *Firearms Licensing Law*, pp. 142-46; Home Office, *Firearms Security Handbook*, pp. 19-23.

experience.<sup>411</sup> Even their support has certain qualifications, namely that it is contingent upon the knowledge and assumptions of the individual occupying the position. Without a codified framework to standardise the decision-making process between position-holders, there is no guarantee of its long-term consistency or efficacy. Given the limitations of the existing apparatus, there is an evident need for comprehensive guidance on the regulation of weapons in a museum setting. This would ideally bring together all the relevant frameworks in a single place to provide authoritative and accessible advice for the maintenance of weapons collections.<sup>412</sup> Reaching a definitive statement of best practice in this field will be an arduous undertaking, as it would need to consider the diverse priorities and objectives of the many relevant stakeholders – government departments, the police, licensing authorities, advisory groups, professional bodies, and museums themselves. This study marks an explorative step in this direction, surveying the legal, professional, and ethical dimensions of weapons management in a cultural context. The Armouries' registrar staff are not the only group who would benefit from clearer advice on this subject. Museum professionals need to be confident in navigating the prevailing regulatory assemblage if they are to facilitate meaningful access to weapons or any other restricted collections. After all, what is the point of holding such objects on behalf of society if the public cannot engage with them?

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<sup>411</sup> UK Registrars Group, 'Meet the ACE Security Team'.

<sup>412</sup> Bell, interview, 24 March 2022, p. 12; Robson, interview, 1 April 2022, p. 13; Kaines, interview, 9 May 2022, p. 18; McKnight, interview, 22 February 2023, p. 8.

### Chapter 3: Ethical Paradigms

When I saw the job at the Armouries, I thought do I want to work with that? Do I even want to work with that collection? It felt like it had got extra ethical dilemmas to another museum collection really. It's a very difficult topic because I think many of the same things apply really to weapons as to other collections, in a sense. But I suppose it's ramped up because potentially these are objects that can kill people. I mean the museums sector at the moment is discussing the ethics of museums themselves, of displaying any objects, and what are the narratives framing them. I think it's the fact that these very objects are used potentially in conflict between different groups that really ramps it up.<sup>413</sup>

On 7 January 2022, the Armouries unveiled a temporary exhibition entitled 'At the Sharp End'. It showcased the work of Operation Jemlock, an ongoing campaign to reduce violent crime in West Yorkshire through community prevention initiatives and targeted police intervention.<sup>414</sup> It included a striking case filled with a range of knives and other bladed articles that were seized during this exercise (Figure 6). Yet, the power of the final display gave little indication of the work behind its creation. The challenge of exhibiting the selected weapons did not stem from any codified access restriction. From a regulatory perspective, this display was no different to the use of the Armouries' own collections in its permanent galleries. As the first chapter has shown, its museum status exempts it almost entirely from the constraints of offensive weapons law. Instead, the obstacles that had to be overcome were primarily ethical in nature. Chief among these was that the exhibited weapons had proven criminal associations. Even for the Armouries, an institution dedicated to the stewardship of arms and armour, this subject is an ethical minefield. It is difficult – and as some argue, irresponsible – to disassociate weapons in museum collections from their ongoing use in violence.<sup>415</sup> The criminal background of the articles included in 'At the Sharp End' certainly emphasised this disquieting connection. Their mere presence in a museum could have raised awkward questions if not handled delicately. The ethical complexity of the exhibition was further compounded by its immediacy. In a departure from the Armouries' predominant historical focus, it tackled the current issue of knife crime. The project team were keenly attuned to the public reception of the display throughout the process, not least by those

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<sup>413</sup> Katie Robson, Registrar - Royal Armouries (2), interviewed by Stuart Bowes, 18 July 2022, p. 1.

<sup>414</sup> Royal Armouries, 'At the Sharp End' <<https://royalarmouries.org/event/exhibition-at-the-sharp-end/>> [accessed 13 June 2022].

<sup>415</sup> Tucker and others, p. 739.

who had experienced its effects first-hand.<sup>416</sup> Institutional awareness of audience needs acquired particular urgency in light of this challenging and distressing theme. The Armouries thus developed an interpretative approach that prioritised human stories, set against the forensic treatment of the confiscated blades.<sup>417</sup> This was seen as the most sensitive way to portray the harmful impact of knife crime on individuals. Given the gravity of the subject, the public exhibition of these seized weapons could only proceed following careful consideration from the Armouries' staff.



**Figure 6: 'At the Sharp End' Seized Blades Display**

Photographed by the author, 10 June 2022.

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<sup>416</sup> Jen Kaines, Head of Collection Services - Royal Armouries (3), interviewed by Stuart Bowes, 1 August 2022, pp. 14-15.

<sup>417</sup> Laura Bell, Director of Collections - Royal Armouries (3), interviewed by Stuart Bowes, 1 August 2022, p. 17.

Ethical conversations were central to the development of ‘At the Sharp End’ from its inception. This was a prudent approach given both the sensitive nature of its subject matter and its collaborative creation. The exhibition was developed in partnership with the West Yorkshire Violence Reduction Unit (WYVRU). As a task force launched in 2020 to reduce violent crime, working with the Armouries enabled WYVRU to raise awareness of its efforts to tackle knife carrying through pre-emptive community intervention.<sup>418</sup> The fact that this remains a live issue meant that both organisations had to tread carefully during the creation process. At one stage, the steering committee considered cancelling the exhibition due to the publication of research that suggested raising public awareness of confiscated weapons could prompt an increase in knife carrying.<sup>419</sup> It was ultimately decided that ‘At the Sharp End’ should go ahead as planned, but this was no forgone conclusion. It was only through sustained reflection and proactive communication with its partners that the Armouries could respectfully display the physical evidence of violent crime. The major role of a police agency in this exhibition, as both co-curator and lender, had significant ethical consequences in itself. It brought together two distinct professional cultures with very different approaches to material objects. It is standard practice for law enforcement to destroy seized weapons once they have been presented as evidence and their forensic worth has been exhausted.<sup>420</sup> This fate therefore awaited the objects used in ‘At the Sharp End’. Under normal circumstances, the destruction of criminal evidence would raise few qualms. But translated into a museum context, where material culture holds special significance, this process was less straightforward. After all, a key premise of museum practice is that all objects should be preserved in perpetuity for the benefit of future generations.<sup>421</sup> Even allowing for the problematic associations of the weapons in ‘At the Sharp End’, their planned destruction fundamentally breached this central duty. The ethics surrounding this initiative was mostly uncharted territory for the Armouries’ registrar department. Institutional policy, for example, assumes that it will be borrowing permanently accessioned collections.<sup>422</sup> In this instance, however, the legal obligation to

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<sup>418</sup> West Yorkshire Violence Reduction Unit, *Annual Report Summary: 2021/22* (Leeds: West Yorkshire Combined Authority, 2022), p. 10.

<sup>419</sup> Bell, interview, 1 August 2022, p. 16; Nicola Cogan and others, 'Are Images of Seized Knives an Effective Crime Deterrent? A Comparative Thematic Analysis of Young People's Views within the Scottish Context', *Journal of Youth Studies* (2022), 1-19 (p. 15).

<sup>420</sup> Kaines, interview, 1 August 2022, p. 17; Robson, interview, 18 July 2022, p. 9.

<sup>421</sup> Yerkovich, p. 448.

<sup>422</sup> Royal Armouries, *Collections Development Policy* (Leeds: Royal Armouries, 2019), p. 3.

destroy the weapons held primacy and the Armouries' personnel had to deviate from standard practice. Coming to terms with the contravention of established professional norms is never an easy task, even when there is strong ethical justification to do so.

The unique ethical challenges presented by the 'At the Sharp End' exhibition had a profound impact on its practical realisation. The Armouries' registrar staff had to adapt routine institutional procedures in certain ways to fulfil the unusual demands of showcasing blades seized by law enforcement. Firstly, there was the matter of working with WYVRU as a lender. While the Armouries collaborates closely with several police authorities to maintain its weapons licences, the process of borrowing objects departs from these established interactions. Museum loans are binding contracts that outline a range of specific duties for both borrowers and lenders.<sup>423</sup> This situation is expected by cultural institutions with established loans programmes, but these arrangements often have to be clarified for less experienced parties. The partnership between the Armouries and WYVRU effectively functioned as an exchange between a museum and a private lender. The Armouries' registrar staff could thus draw upon their previous experience in borrowing objects from independent collections. This entails conveying the professional expectations around this elaborate process, such as providing detailed documentation about the loaned objects.<sup>424</sup> Establishing a common understanding was central to the realisation of 'At the Sharp End', as police agencies do not always share ideas of best practice with museums. Yet in other respects, the Armouries followed law enforcement standards in the treatment of evidence. Omitting the details of the weapons' criminal history, for example, was one of the key conditions of the loan. There was collective acknowledgement that it would be inappropriate to circulate any information about their prior owners or uses, so the Armouries only recorded its possession by the relevant police authority.<sup>425</sup> This marked a considerable departure from institutional procedure. Conducting due diligence to establish thorough provenance for all objects entering an institutional collection, whether permanently or temporarily, is standard museum practice.<sup>426</sup> When much of this information is officially confidential, however, the Armouries' registrar staff can only document a limited amount. Working across

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<sup>423</sup> Rose Wood and Andrea Gardner, 'Loans', in *MRM6: Museum Registration Methods*, ed. by John E. Simmons and Toni M. Kiser, 6th edn (Lanham: Rowman & Littlefield, 2020), pp. 134-48 (p. 140).

<sup>424</sup> Robson, interview, 18 July 2022, p. 10.

<sup>425</sup> Kaines, interview, 1 August 2022, p. 16.

<sup>426</sup> Geoffrey Lewis, 'The *ICOM Code of Ethics for Museums*: Background and Objectives', in *Museums, Ethics and Cultural Heritage*, ed. by Bernice L. Murphy (London: Routledge, 2016), pp. 45-53 (p. 48).



professional boundaries requires all parties to seek genuine accommodation. Perhaps the greatest deviation from the Armouries' standard collections procedures in preparation for 'At the Sharp End' arose from the prearranged destruction of the displayed weapons. It was deemed unnecessary to value, insure, or record the physical condition of objects that would soon be destroyed anyway.<sup>427</sup> Somewhat counterintuitively, their heightened ethical sensitivity in fact simplified this aspect of the exhibition process. Where legal, professional, and ethical actors are so closely intertwined, it can be difficult to predict how they will come together to determine public access to weapons collections.

The example of 'At the Sharp End' accentuates many of the complexities and contradictions of museum weapons collections. The Armouries' adaptation of certain routine procedures to accommodate WYVRU protocol emphasises the need for flexibility when using weapons in museum programming. The unique ethical challenges raised by these collections require its registrar staff to consider the circumstances of each case on its own merits. They can rely on few certainties in the field of weapons management, not least because of material and moral diversity of these objects. One of the few constants is the primacy of law. In the case of 'At the Sharp End', the obligation to destroy the seized blades profoundly shaped their treatment. This principle applies to the Armouries' weapons holdings in their entirety, as ethical conduct is formulated in dialogue with, and is conditioned by, the prevailing legal framework.<sup>428</sup> This episode thus affirms the interconnected nature of the regulatory assemblage governing weapons management. The Armouries' registrar staff must maintain a holistic overview of these enmeshed traditions in order to prepare its collections for public use in a safe and ethical manner. This was especially important during the development of 'At the Sharp End' given the challenging nature of the exhibited objects. Indeed, their inclusion as tangible proof of criminal activity underscores the split personality of museum weapons collections in general. Each of the confiscated weapons selected for public display took on a dual identity, as both forensic evidence and museum object.<sup>429</sup> While the majority of the Armouries' accessioned weapons collections do not have such a contentious legacy (where this is possible to establish), they nonetheless manifest similar, albeit less dramatic, tensions. They are at once instruments of conflict and cultural artefacts, identities that coexist uneasily. This is a form of 'musealisation', the integration of an

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<sup>427</sup> Robson, interview, 18 July 2022, pp. 9-10.

<sup>428</sup> *Museum Ethics*, p. 24.

<sup>429</sup> Bell, interview, 1 August 2022, pp. 17-18.

item into the unique epistemological context of museums.<sup>430</sup> Registrars play a crucial role in this process. The procedures they oversee – documentation, storage, inventory control, auditing – contribute greatly to the assimilation of objects into a museum’s conceptual structures.<sup>431</sup> However, the musealisation of weapons engenders an intractable problem: their status as museum objects supports the maximisation of public access, while their capacity for harm urges the opposite. All museums must balance the needs of their collections with the needs of their audiences, but the presence of weapons introduces another ethical dimension.<sup>432</sup> As the opening quotation demonstrates, the Armouries’ registrar staff are highly attuned to the potential dangers associated with its weapons holdings. After all, it is their duty to work through the ethical ramifications of facilitating public access to these challenging objects. No matter how far an individual weapon is assimilated into a museum collection, the connotations of conflict and violence can never be effaced entirely. This fundamental dissonance distinguishes their active cultural use from standard conceptions of ethical museum practice.

### **Ethical Pluralism at the Royal Armouries**

As the example of ‘At the Sharp End’ has demonstrated, the ethical issues surrounding a museum’s engagement with weapons collections can be substantial. Clear guidance on the intricacies of this sensitive work would thus be a valuable resource. Consistent with the other museological frameworks governing the Armouries’ collections, however, models of ethical practice specific to weapons management are scarce in reality. This is quite curious considering the prominence of the sector discourse around museum ethics. Monographs examining the multifaceted dialogue between ethics and various aspects of museum operations have routinely appeared every few years, not to mention the steady stream of critical articles.<sup>433</sup> Ethics has thus been established as a major theme in the academic discipline of museum studies. One of the fundamental issues addressed by this established body of work is the definition of museum ethics itself. In any given group there would likely be as many different responses to this issue as museum professionals

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<sup>430</sup> André Desvallées and François Mairesse, *Key Concepts of Museology* (Paris: International Council of Museums, 2009), pp. 50-51.

<sup>431</sup> Simmons, 'Collection Care and Management', p. 235.

<sup>432</sup> Tucker and others, pp. 756-57.

<sup>433</sup> *Museum Ethics; The Routledge Companion to Museum Ethics: Redefining Ethics for the Twenty-First Century Museum*, ed. by Janet Marstine (Abingdon: Routledge, 2011); *New Directions in Museum Ethics*, ed. by Janet Marstine, Alexander A. Bauer, and Chelsea Haines (London: Routledge, 2014); Gary Edson, *Museum Ethics in Practice* (London: Routledge, 2016); Miller.

present. Still, much common ground would be found in the notion that museum ethics comprises the shared values, principles, judgements, and duties perceived to underpin their everyday activities.<sup>434</sup> It essentially expresses a self-determined consensus about the conduct museums should adopt to effectively perform their role, rather than what they are compelled to do by higher authorities. This profound introspection has not emerged out of nowhere. It draws on an ingrained sector preoccupation with raising shared standards of professional conduct, one which has heavily influenced the development of operational practice in museums. Proceeding on the principle that museums have a fundamental responsibility to wider society, many professionals have actively sought to reorient their own actions and institutional norms to better measure up to changing ethical contexts.<sup>435</sup> At times these efforts have produced lasting change and at times they have been frustrated, but overall they have enshrined the affirmative idea that museums can and should improve. This concern for professional growth has even permeated the highest levels of cultural officialdom. From the late twentieth century, the cause of museum ethics has been advocated by supranational representative bodies like UNESCO and the International Council of Museums (ICOM).<sup>436</sup> With the ardent involvement of such organisations, the expression of accepted sector practice has also come to be associated with the strengths and weaknesses of formal bureaucratic process. Individual, institutional, and universal interests all therefore intersect in the generation of museum ethics – but not always in a harmonious manner. While it is clear then that museum work is profoundly motivated by ethical considerations, the contours of the resulting multifaceted response are tougher to negotiate.

One of the defining features of this ongoing ethical discourse has been a strong tendency towards codification. Traditionally, the museum sector has sought to capture and then disseminate rigorous models of professional conduct through authorised codes of ethics. The first recognisable example of this archetypal guidance document was issued in 1925 by the American Association of Museums as the *Code of Ethics for Museum Workers*, but the late 1970s marked the true watershed moment in this process with a dramatic expansion in the publication of ethical guidelines across the museum world.<sup>437</sup> By virtue of their cooperative formulation, establishment backing, and stable

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<sup>434</sup> *Museum Ethics*, pp. xxi-xxii.

<sup>435</sup> Besterman, p. 431.

<sup>436</sup> Lewis, pp. 45-46.

<sup>437</sup> Mary Anne Andrei and Hugh H. Genoways, 'Museum Ethics', *Curator: The Museum Journal*, 40 (1997), 6-12 (p. 6).

longevity, codes of ethics have come to occupy a staple position in the field of museum ethics. This concerted endeavour to articulate professional standards remains strong today, exemplified by the many prevailing frameworks that seek to foster ethical behaviour across all museum activities. This is a process that is discernible both at the level of individual institutions – the Armouries has its own ‘Ethics Policy’, for example – and the museum sector as a whole in the form of professional codes of ethics.<sup>438</sup> These general statements of ethical practice are designed to provide clear benchmarks for all museum personnel, regardless of their role. Collections feature prominently in these documents. Not only do the ownership, care, and use of museum objects almost invariably appear in sector-wide codes of ethics, but they are also subject to discipline-specific guidelines.<sup>439</sup> This codifying impulse has been so pervasive within the museum sector that it has spread throughout its constituent occupations, including registrars. Decades of professional dialogue around the responsible supervision of institutional collections first produced a dedicated code of ethics for registrars in the mid-1980s and then a revised version applying to collections specialists altogether in the last few years.<sup>440</sup> While these occupational manifestos have been produced for a North American audience rather than a British one, many of the same conventions still apply. Either way, registrars are clearly not short of occupational guidance for appropriate collections stewardship. In fact, it is arguable that the opposite is true. The proliferation of ethical models of collections practice risks the danger of museum professionals being overwhelmed by the sheer mass of their provisions. The negotiation of these various standards has been imaginatively likened to ‘dancing through the minefield’.<sup>441</sup> One wrong move and everything blows up in your face. When subscribing to museum codes of ethics, it is important to strike the right balance between applicability and clarity. Abundance can prove just as perplexing as scarcity to the unwary practitioner.

Codes of ethics may be entrenched features of the museum sector, but they do not represent the whole picture. Ethical collections practice is not reducible to the content of these standards, however comprehensive they may be. They are a distillation

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<sup>438</sup> Royal Armouries, ‘Ethics Policy’ (unpublished internal document, 2016); Museums Association; International Council of Museums, *ICOM Code of Ethics*.

<sup>439</sup> Yerkovich, p. 446.

<sup>440</sup> Cordelia Rose, ‘A Code of Ethics for Registrars’, *Museum News*, 63.3 (1985), 42-46 (p. 43); Association of Registrars and Collections Specialists, *Code of Ethics and Professional Practices for Collections Professionals* (Washington, DC: American Alliance of Museums, 2021), pp. 1-2.

<sup>441</sup> Michael Pickering, ‘“Dance through the Minefield”: The Development of a Practical Ethics for Repatriation’, in *The Routledge Companion to Museum Ethics: Redefining Ethics for the Twenty-First Century Museum*, ed. by Janet Marstine (Abingdon: Routledge, 2011), pp. 256-74 (p. 256).

of intersecting debates, concepts, and processes ascribed to appropriate professional behaviour. What constitutes ethical conduct in museums is thus constantly evolving, fuelled by the shifting values of the societies they serve and ongoing self-reflection by museum practitioners themselves.<sup>442</sup> Published documents struggle to keep pace with these changes, as their revision is often a formalised and time-consuming process that is only worth undertaking periodically. While codes of ethics are a useful starting point for any investigation into the ethical treatment of museum collections, it is necessary to look beyond them to gain a fuller understanding of the field. Their provisions are only as effective as far as they are ‘agreed to, monitored, and abided by’ in reality.<sup>443</sup> Institutions have to work out how to translate these recommendations from the page into practice, one of the many duties of the Armouries’ registrar staff. Fortunately, they are not alone in this endeavour. Other museums encounter similar ethical challenges in the management of their collections, so there is scope to share effective strategies across the sector. This collaborative approach is strongly advocated by those seeking to reimagine models of professional development. Proponents of this ‘new museum ethics’ contend that institutions should be transparent in addressing ethical concerns where possible to encourage proactive and robust responses.<sup>444</sup> The key message is that museums should learn from one another to better grasp the ethical dimensions of their practice. It is thus important to keep this broader professional context in mind when considering the ethics of collections access. The existence of this shared understanding of ethical conduct also presupposes a common set of values that underpin the sector.<sup>445</sup> When individuals and institutions adopt ethical stances on specific issues, they draw upon enduring principles to justify their actions – even if they do not always realise it. These motivations can be linked to longstanding ethical paradigms. In practice, museums embrace different philosophical traditions where the circumstances require it, resulting in a situation of ‘moral pluralism’.<sup>446</sup> The challenge faced by all institutions is how to reconcile these principles when they do not align with one another, a common occurrence in the course of delivering public access to cultural collections. Any study of museum ethics must therefore accommodate the reality of its multifaceted and inconsistent expression.

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<sup>442</sup> Besterman, p. 432.

<sup>443</sup> Miller, p. 133.

<sup>444</sup> Marstine, p. 6.

<sup>445</sup> Nicholson and Williams, p. 176.

<sup>446</sup> Judith Chelius Stark, 'The Art of Ethics: Theories and Applications to Museum Practice', in *The Routledge Companion to Museum Ethics: Redefining Ethics for the Twenty-First Century Museum*, ed. by Janet Marstine (Abingdon: Routledge, 2011), pp. 26-40 (p. 31).

The ethical stewardship of museum collections may already be the product of multiple intersecting discourses, but the introduction of weapons adds a further layer of complexity. The association of these objects with conflict and violence raises unique challenges for institutions charged with their stewardship. Some of these issues are already addressed by weapons law and museological governance structures, but many more are outside of their remit. How should institutions flag up problematic objects during routine management? Should staff be allowed unrestricted access to weapons? Are there instances where museums should not encourage public engagement with weapons? Who should hold the authority to make these decisions? Should museums possess weapons at all?<sup>447</sup> Such questions rarely have definitive answers, as they are heavily contingent on institutional circumstances. At the Armouries, its registrar staff address many of these pressing concerns. Maintaining ethical compliance is one of their key functions in the area of risk management (see Figure 1). The diligent exercise of this duty is especially critical at the Armouries given the heightened sensitivities around the use of its weapons. In order to better understand best practice in the maintenance of these collections, the proceeding chapter considers the various sources of ethical conduct available to the Armouries' registrar staff. It adopts the model of museum ethics articulated by Marstine, Dodd, and Jones, which encompasses three overlapping expressions: ethical codes, case studies, and values and principles.<sup>448</sup> One advantage of this multi-pronged approach is that it offers a more comprehensive appraisal than focusing exclusively on any of these individual elements. Drawing attention to the diverse, adaptive, and emergent origins of ethical museum behaviour complements the use of assemblage theory to explore the nuances of providing access to restricted objects.<sup>449</sup> The main body of this chapter is therefore structured along the same lines. It explores the distinct role of each element in informing the Armouries' treatment of its weapons collections to generate an overview of the field. Identifying the connections between the different expressions of ethical museum conduct is central to this endeavour. It is the mutual interaction of professional codes, operational examples, and guiding principles that has shaped contemporary notions of museum ethics. Indeed, museum professionals are better placed to make 'informed and responsive' decisions

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<sup>447</sup> *Does War Belong in Museums? The Representation of Violence in Exhibitions*, ed. by Wolfgang Muchitsch (Bielefeld: Transcript Verlag, 2013).

<sup>448</sup> Marstine, Dodd, and Jones, p. 74.

<sup>449</sup> Jennie Morgan, 'Assembling the New: Studying Change Through the "Mundane" in the Museum as Organization', *Museum and Society*, 16 (2018), 157-70 (p. 160).

when they draw upon all of these complementary models.<sup>450</sup> It thus follows that the Armouries' registrars staff have to be keenly aware of these sources of ethical collections practice in all their complexity. The following sections examine their engagement with this assorted material to work through the ambiguities of providing public access to museum weapons collections.

### **Professional Ethics: Established Sector Codes**

The most prominent sources of guidance informing the conduct of the Armouries' registrar staff are the numerous codes of ethics that populate the museum landscape. Developed by acknowledged sector bodies, they stipulate the principles and processes that are generally held to constitute ethical practice in the museum sector. Two of these codes are especially pertinent to this study, those issued by the Museums Association (MA) and ICOM, which share the unambiguous title of *Code of Ethics for Museums*. As a member of both professional groups, the Armouries officially subscribes to these frameworks.<sup>451</sup> There are compelling reasons for it to observe these standards of conduct, even though they are not enforced by legal or financial mechanisms. Instead, they leverage the need to maintain institutional standing. Infringement of either code carries the threat of disciplinary action, including complete exclusion from these presiding professional bodies.<sup>452</sup> The ensuing censure is almost prohibitive for any museum. Northampton Museums Service experienced the full force of these sanctions when it controversially sold an irreplaceable ancient Egyptian statue to fund a gallery extension, as its sites were ejected from MA membership and lost accredited status.<sup>453</sup> Infringement has serious consequences. It is in the interests of the Armouries to observe the conceptions of ethical practice developed by ICOM and MA if it intends to retain a leading role in the museum community. Their common approach is further evident in their respective connections to the wider museological landscape. Not only do both codes stress the importance of legal compliance, but they also encourage museums to observe any relevant professional standards in their work.<sup>454</sup> In their explicit allusion to

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<sup>450</sup> Marstine, Dodd, and Jones, p. 79.

<sup>451</sup> Royal Armouries, *Collections Policy Framework*, p. 3.

<sup>452</sup> Museums Association, p. 21; International Council of Museums, *International Council of Museums (ICOM) - Statutes* (Paris: International Council of Museums, 2017), pp. 3-4.

<sup>453</sup> Jenny Kidd, 'Debating Contemporary Museum Ethics: Reporting Sekhemka', *International Journal of Heritage Studies*, 23 (2017), 493-505 (p. 496).

<sup>454</sup> International Council of Museums, *ICOM Code of Ethics*, pp. 36-41; Museums Association, pp. 21-22.

these other frameworks, the ICOM and MA codes further interfuse the regulatory assemblage governing museum operations. The parallels do not end here, as it is evident that they have been consciously devised to cover much the same ground. The MA Code even asserts its consistency with its ICOM counterpart explicitly.<sup>455</sup> It follows then that they adopt analogous approaches to major aspects of museum practice. However, this does not mean that their provisions are identical in every respect. The depth of their coverage does vary, which causes their treatment of institutional collections to differ in subtle ways. Yet the overall resemblance of the ICOM and MA codes suggests that they inform the use of the Armouries' weapons holdings in a comparable manner. This section therefore examines these documents in parallel across a number of key themes.

Before investigating the impact of these kindred frameworks on the Armouries' weapons collections, it is worth considering their origins. Both codes were conceived towards the end of the twentieth century (the MA's in 1977 and ICOM's in 1986), as expressions of an emerging professional identity in museums and a corresponding need for standards of conduct that transcended institutional and national boundaries.<sup>456</sup> The foundational purpose of these codes has endured. Their specific recommendations have since been revised to respond to new challenges – the ICOM Code in 2004 and the MA Code on five occasions, with another version set to be issued in 2024 – but they still essentially seek to convey a universal notion of ethical museum practice.<sup>457</sup> In pursuit of this lofty aspiration, both documents address a range of common institutional dilemmas in areas as varied as operational governance, community engagement, and employee conduct. One of their principal concerns is the proper performance of collections management. The MA Code devotes one of its three major chapters to the 'Stewardship of Collections', as well as outlining further recommendations related to collections in its other sections.<sup>458</sup> The ICOM Code follows much the same pattern. While its guidance on the appropriate treatment of museum objects mainly appears under the principle that collections are held in trust for society, the challenges of managing material heritage also permeate many of its other clauses.<sup>459</sup> In both instances, ethical behaviour towards

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<sup>455</sup> Ulph, 'Museums Association's Code of Ethics', pp. 155-56.

<sup>456</sup> Besterman, pp. 433-35.

<sup>457</sup> International Council of Museums, 'Code of Ethics' <<https://icom.museum/en/resources/standards-guidelines/code-of-ethics/>> [accessed 21 March 2022]; Museums Association, p. 20; Museums Association, 'Code of Ethics Review' <<https://www.museumsassociation.org/campaigns/ethics/code-of-ethics-review/>> [accessed 9 August 2023].

<sup>458</sup> Museums Association, *Code of Ethics*, pp. 6-7.

<sup>459</sup> International Council of Museums, *ICOM Code of Ethics*, p. v.



cultural holdings transcends the immediate conditions of their management. It is clear then that ethical collections stewardship is a key preoccupation of these codes and, by extension, the museum community as a whole. Their role as a sector model of best practice is further cemented by the general applicability of their provisions. Like the other museological frameworks examined in the previous chapter, the ICOM and MA codes take a non-disciplinary approach to museum collections. Neither one contains any direct reference to weapons.<sup>460</sup> The corollary of their breadth is a lack of specificity. The Armouries' collections are treated uniformly under these frameworks, which make little provision for the additional sensitivities surrounding its weapons holdings. Like the operational standards of collections management, these codes establish a baseline of ethical practice but do not provide specific detail. Weapons may be absent from their terms, yet it is still important to examine the content of these general guidelines. After all, these codes provide an overarching ethical apparatus for all interactions with the Armouries' objects, including the provision of access to its weapons collections.

It has already been shown that competent collections stewardship is a major theme of both the MA and ICOM Codes of Ethics. But what does this actually entail for a museum like the Armouries? Their treatment of the subject focuses heavily on the reconciliation of preservation and access, which is essential to the 'responsible and viable' weapons management pursued by the guiding research questions. While both codes contain formulations to that effect, this duty is expressed most succinctly by the MA Code: 'Balance the museum's role in safeguarding items for the benefit of future audiences with its obligation to optimise access for present audiences.'<sup>461</sup> This provision reinforces the Armouries' responsibility to reconcile these fundamental objectives, a thread that is also prominent in many other museological frameworks (see Chapter 2). This connection is even made explicit in the Additional Guidance document published by the MA to supplement the basic code. It advises that museums should use PAS 197 (now BS 17820) to determine the methods of care, the levels of risk, and the means of access appropriate to their specific collections.<sup>462</sup> Here, the interdependence of the constituent parts of the regulatory assemblage governing the Armouries' collections is clearly evident. If the MA Code provides an effective overview of ethical collections

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<sup>460</sup> Kaines, interview, 1 August 2022, p. 8.

<sup>461</sup> Museums Association, *Code of Ethics*, p. 14.

<sup>462</sup> Museums Association, *Code of Ethics: Additional Guidance* (London: Museums Association, 2015), p. 4.

stewardship, then its ICOM counterpart outlines a number of practical measures to achieve it. Its subsection on the ‘Care of Collections’ is especially notable in this regard, specifying a number of responsible collections practices: proportionate institutional policies, appropriately trained personnel, robust documentation procedures, and an ingrained culture of preventive conservation.<sup>463</sup> All of these measures play their part in fostering effective weapons management in museums and, in the Armouries’ case, they complement the standards of collections stewardship it observes to maintain accredited status. There are few better indicators of the synergy between ethical and professional concerns.<sup>464</sup> However, the recommendations of the MA and ICOM codes outlined so far address museum objects indiscriminately, encompassing but not singling out weapons. Although the unique challenges of weapons management are absent from this general guidance, this actually corresponds to the Armouries’ overall collections strategy. When applying the content of these ethical codes, its registrar staff rarely differentiate between weapons and other objects.<sup>465</sup> The codes’ lack of specificity does little to impede the practical enactment of their guidelines. Just because the MA and ICOM codes adopt a holistic approach to collections stewardship, this does not necessarily mean that they have less of an impact on public engagement with the Armouries’ weapons holdings.

Despite the conscious generality of these ethical codes, they do contain certain clauses that more overtly govern the use of the Armouries’ weapons collections. These more targeted recommendations are found in the MA’s Additional Guidance document, which was introduced alongside the 2015 incarnation of the Code to keep the latter as streamlined and accessible as possible.<sup>466</sup> One of its provisions for collections access tacitly addresses the challenging nature of museum weapons collections. The Guidance urges museums to thoroughly consider their use of controversial or distressing objects in public programming, informed by the consultation of key stakeholders to better negotiate any sensitive issues.<sup>467</sup> Weapons surely fall into this category, as they can be stark reminders of violence and conflict to their victims. Just because it is possible to provide access to the national collection of arms and armour, this does not necessarily mean it is appropriate. Its registrar staff closely scrutinise all uses of its modern firearms

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<sup>463</sup> International Council of Museums, *ICOM Code of Ethics*, pp. 14-15.

<sup>464</sup> Patrick J. Boylan, ‘The Museum Profession’, in *A Companion to Museum Studies*, ed. by Sharon Macdonald (Oxford: Blackwell Publishers, 2006), pp. 415-30 (pp. 424-25).

<sup>465</sup> Robson, interview, 18 July 2022, p. 2.

<sup>466</sup> Ulph, ‘Museums Association’s Code of Ethics’, p. 144.

<sup>467</sup> Museums Association, *Code of Ethics: Guidance*, p. 2.

collections, for instance, and have at times decided not to display specific examples from within living memory to avoid causing distress to the community.<sup>468</sup> The traumatic legacy of certain weapons is still too immediate to be suitable for general interaction. The MA guidance may not have covered this particular scenario, but it is a logical extrapolation from its advice on providing access to sensitive collections. The ICOM Code also informs public engagement with the Armouries' weapons holdings in an oblique manner, albeit in relation to different aspects of museum practice. It stipulates that institutions may formulate special considerations for working collections, where showcasing their use takes priority over their physical preservation.<sup>469</sup> This effectively divests museums of the ethical obligation to maintain these designated objects in perpetuity, as is expected with accessioned collections. Without this exemption, it would be rather difficult for the Armouries to justify its firings of replica muskets or its demonstrations of sword combat.<sup>470</sup> It may be phrased in the same blanket terms as the Code's other provisions – and the related museological frameworks – yet it has a distinct impact on public access to the Armouries' weapons collections. These examples highlight the importance of rigorously scrutinising ethical guidelines, as it would be easy for practitioners to overlook a key provision with just a superficial inspection. This responsibility is especially pressing for the Armouries' registrar staff, whose approach to weapons management has to accommodate a series of further constraints and sensitivities. Censure by professional ethics committees is not their only concern.

These codes of ethics resemble the prevailing museological frameworks in more than just their approach, there are also significant parallels in their subject matter. Safety is a common theme throughout these standards, one that is crucial to the Armouries' treatment of its weapons collections. Both the ICOM Code and the MA Additional Guidance emphasise the institutional duty to protect everyone present in the museum. The ICOM Code adopts a general formulation along these lines, but its MA counterpart goes further in stipulating that museums should follow clear working practices around 'potentially hazardous or dangerous items in the collection'.<sup>471</sup> This has significant consequences for the routine work of weapons management, even if these 'clear working practices' are not actually specified. The access arrangements to the

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<sup>468</sup> Bell, interview, 1 August 2022, pp. 5-6; Kaines, interview, 1 August 2022, pp. 17-18.

<sup>469</sup> International Council of Museums, *ICOM Code of Ethics*, p. 10.

<sup>470</sup> Royal Armouries, *Collections Access Policy*, p. 4.

<sup>471</sup> International Council of Museums, *ICOM Code of Ethics*, p. 3; Museums Association, *Code of Ethics: Guidance*, p. 13.

Armouries' study collections offer an indicative example. All staff invigilators are empowered to end sessions prematurely if individuals ignore institutional handling guidelines in order to maintain a safe environment.<sup>472</sup> This response is not specified in any code of ethics (or in law for that matter), but instead represents an instance of the Armouries studying standards of best practice and adapting them to the specific needs of weapons. The ethical code once again provides a basic course of action, but it is the Armouries' collections staff who ultimately make the necessary judgement on the ground. This example also alludes to the other major safety commitment enshrined by these codes, the safeguarding of museum collections. Particularly prominent in this respect are passages relating to emergency disaster planning, which are designed to mitigate harm to both people and objects.<sup>473</sup> Should an explosion occur, for example, the destruction would be indiscriminate. In response, both the ICOM Code and the MA Guidance recommend that museums should have robust contingency measures in place – although only the latter singles out the additional safety needs of 'potentially dangerous items'.<sup>474</sup> These requirements reinforce the general basis of the regulatory assemblage governing the Armouries' weapons collections. They may be less impactful in mitigating the destructive potential of its explosives collections, as this is already the primary concern of the relevant legislation (see Chapter 1). But where the law is more security focused, as with firearms and offensive weapons, they are a key agent in establishing a minimum benchmark for safety. Even if these codes are rather sparse in detail, they do affirm a central principle of weapons management at the Armouries. All access arrangements facilitated by its registrar staff must accommodate the safety of both individuals and the objects themselves.

The treatment of collections security by these ethical codes bears many of the same hallmarks, resulting from its close affinity with safety concerns. Indeed, the MA Guidance's provision for institutional security is outlined in the exact same clause as that for collections safety.<sup>475</sup> Collections should be equally as protected against loss as damage and deterioration. While collections security is covered by its own provision in the ICOM Code and thus contains greater detail, its content is very similar. A museum's

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<sup>472</sup> Bell, interview, 1 August 2022, p. 4.

<sup>473</sup> Emma Dadson, *Emergency Planning and Response for Libraries, Archives and Museums* (London: Facet Publishing, 2012), p. 7.

<sup>474</sup> International Council of Museums, *ICOM Code of Ethics*, p. 4; Museums Association, *Code of Ethics: Guidance*, p. 4.

<sup>475</sup> Museums Association, *Code of Ethics: Guidance*, p. 4.

governing body should implement appropriate measures to prevent the theft and damage of objects, whether on display, in storage, or in transit.<sup>476</sup> Given the resemblance of their respective passages on safety and security, they influence the Armouries' operations in much the same way. Neither code outlines the specific security measures for weapons collections, but they do suggest that museums should implement controls proportional to their institutional circumstances. The ICOM Code's choice of the word 'appropriate' is telling here, as it mirrors the language employed by other museological frameworks in relation to security (see Chapter 2). The risks inherent to weapons collections mean that the appropriate safeguards have to be more substantial in the Armouries' case. Staff supervision offers an instructive example of this principle. The Armouries insists upon a basic ratio of one staff member to every three visitors in its weapons stores, which can be altered depending on the situation and the precautions in force.<sup>477</sup> This measure may not be specified by the MA and ICOM codes (or any other professional framework), but its implementation is a logical response to their calls for a proportional security system. Again, the Armouries' registrar staff go beyond the codified terms of the regulatory assemblage to ensure the ethical management of its weapons holdings. In addition to safeguarding collections, these professional codes of ethics seek to protect all accompanying material. Both codes stress the importance of avoiding the disclosure of sensitive collections information, while the MA Additional Guidance also outlines the need to provide secure data storage in line with legal requirements.<sup>478</sup> The demands of this broader conception of museum security encompass both the physical and digital spheres. It is prudent for the Armouries to heed these recommendations. The sensitivities surrounding weapons often extend beyond the objects themselves to the historical and personal information associated with them (exemplified by the limited provenance of amnestied firearms, see Chapter 1).<sup>479</sup> The Armouries' registrar staff are thus responsible for overseeing robust information stewardship as well as more tangible security measures. After all, it is expected that the Armouries' cultural holdings will be secured for future generations in their entirety, encompassing the national collection of arms and armour itself as well as the information crucial to its ongoing interpretation.

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<sup>476</sup> International Council of Museums, *ICOM Code of Ethics*, p. 4.

<sup>477</sup> Kaines, interview, 1 August 2022, p. 13.

<sup>478</sup> Museums Association, *Code of Ethics: Guidance*, p. 11; International Council of Museums, *ICOM Code of Ethics*, p. 14.

<sup>479</sup> Adams, p. 105.

Alongside these internal responsibilities, the MA and ICOM codes recognise that the complicated process of lending museum objects requires dedicated ethical provision. The MA Code captures the purpose of this work: museums should ‘loan collections with transparency and competency in order to generate knowledge and engage the public with collections’.<sup>480</sup> This assuredly reinforces the Armouries’ duty to lend its objects, as first expressed in the *National Heritage Act 1983*. Loans are thus acknowledged to be a key means for museums to encourage collections access, even if their specific holdings present greater ethical and practical challenges. A preoccupation of both the MA and ICOM codes is ensuring the legitimacy of all institutional loans through the exercise of due diligence on the selected objects’ provenance. This practice may be more commonly associated with acquisition, but it is also a hallmark of ethical loans management.<sup>481</sup> This is especially important for weapons collections, as an object associated with conflict might reveal a disquieting past on closer inspection.<sup>482</sup> On this subject, the recommendations made by MA and ICOM are almost identical. Both codes exhort museums to undertake thorough research before approving any loan and to reject all items whose legitimate ownership is in doubt.<sup>483</sup> As a national museum working with sensitive collections, the Armouries cannot be seen to endorse the circulation of illicitly obtained cultural material. The other aspect of museum loans supported by these codes is the professional relationships that underpin them. The MA’s Additional Guidance encourages museums to draw up comprehensive agreements together to best ensure the integrity of loaned objects, while the ICOM Code stipulates that insurance or indemnity provision should cover all stages of a loan.<sup>484</sup> While their emphasis does diverge on this subject, together they provide a clear overview for the smooth coordination of museum loans. The reference to indemnity schemes, such as GIS, in the ICOM Code further stresses the interlinked nature of the regulatory assemblage governing public access to the Armouries’ weapons collections. Loans are nonetheless treated quite differently by these various frameworks. The ethical codes take a more strategic approach to lending, while operational frameworks like GIS focus more on its practical mechanics.<sup>485</sup>

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<sup>480</sup> Museums Association, *Code of Ethics*, p. 13.

<sup>481</sup> Matassa, *Museum Collections Management*, pp. 36-40.

<sup>482</sup> Doyle, p. 106.

<sup>483</sup> International Council of Museums, *ICOM Code of Ethics*, p. 9; Museums Association, *Code of Ethics*, pp. 14-15.

<sup>484</sup> Museums Association, *Code of Ethics: Guidance*, pp. 9-10; International Council of Museums, *ICOM Code of Ethics*, p. 4.

<sup>485</sup> Bell, interview, 24 March 2022, p. 4.

Acknowledging the nuances of these distinct guidelines is the first step to following their directives in the course of routine procedure. None of these standards may actually address the specific challenges of lending and borrowing weapons, but together they at least provide a point of departure for the Armouries' registrar staff.

The provisions outlined by the MA and ICOM Codes of Ethics clearly function as key components of the regulatory assemblage governing the Armouries' weapons collections. Together, they provide general models for ethical practice across a range of important fields – preservation, public access, demonstration, safety, security, loans – even if they do not address weapons specifically.<sup>486</sup> The emphasis of these codes does diverge slightly, but there are no major inconsistencies that impede their application to Armouries' collections. Besides these minor discrepancies, their overall approach is almost identical. Both codes affirm the duty of museums to observe all guidance around collections access, whether this is legal, operational, or ethical in origin. The parallels also extend to their content. The ICOM and MA codes outline general approaches that museums should follow to manage their collections for the benefit of all, without going into practical minutiae. In this respect, they closely resemble the accreditation standards. This affinity is no accident, as the MA Code explicitly states that it has been developed to underpin MAS.<sup>487</sup> Professional conceptions of collections management thus owe much to these corresponding ethical standards, reinforcing the interconnected nature of sector regulation. Another resemblance between these codes of ethics and standards of collections management practice is their proportional approach. Like MAS or BS 17820, many sections of the MA and ICOM codes weigh more heavily on museum weapons collections due to their framing. They do not need to address these objects explicitly, as there is an expectation that institutions will apply them to their individual circumstances.<sup>488</sup> Museums themselves must enact standards of collections management in a manner appropriate to their operational requirements. At the Armouries, its registrar staff perform much of this important work. As with the other aspects of the institutional regulatory assemblage, they bridge the evident gulf between weapons regulation and museum practice. Arguably, this is even more of a difficult task with respect to the Armouries' ethical obligations. No equivalents to the Firearms Security Handbook or the Guide on Firearms Licensing Law exist to aid their negotiation of the ethical issues

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<sup>486</sup> Edson, pp. 177-78.

<sup>487</sup> Museums Association, *Code of Ethics*, p. 22.

<sup>488</sup> Besterman, p. 439.

raised by museum stewardship of weapons collections. There are tantalising traces of a code created by the ICOM International Committee on Museums of Arms and Military History (ICOMAM) that would likely address many of the unique challenges around the public use of weapons holdings, but its existence has so far proven illusory.<sup>489</sup> In the apparent absence of specific ethical guidance on weapons management, the Armouries' registrar staff necessarily default to the general provisions of the MA and ICOM codes. Ultimately, these professional codes of ethics are a useful baseline for the management of the Armouries' collections, but its registrar staff have to look elsewhere for clearer ethical guidance on providing access to its weapons holdings.

### **Discursive Ethics: Communication, Collaboration, and Case Studies**

If codes of ethics provide a general basis for the Armouries' treatment of restricted collections, then practical examples of weapons management offer altogether more specific recommendations. Many of the challenges faced by its registrar staff have been confronted elsewhere in one form or another, so it follows that these precedents can serve as a template for the appropriate use of weapons collections. The value of case studies derives from their ability to generate 'in-depth understanding of a specific topic, programme, policy, institution or system', which can be harnessed to inform policy development, professional practice, and community action.<sup>490</sup> This approach therefore has much to recommend it to the Armouries given its potential to foster operational innovation in these various fields. Indeed, its registrar staff are able to refer to various sources of ethical practice when they respond to the challenges affecting routine engagement with its restricted collections. Firstly, there are the lessons learned from its own institutional history. The Armouries can draw on a tradition of systematic weapons management stretching back at least two centuries.<sup>491</sup> Then there is the example set by fellow custodians of weapons collections, whether museums or other bodies. The Armouries' registrar team are able to discuss prevailing ethical practice with experts from across the field. Within the museum sector, this communication is facilitated by professional bodies like UKRG and the European Registrars Group.<sup>492</sup> Referring to alternative models may help the Armouries to decide on an appropriate course of action

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<sup>489</sup> Robson, interview, 18 July 2022, p. 2; Kaines, interview, 1 August 2022, p. 9.

<sup>490</sup> Helen Simons, *Case Study Research in Practice* (Los Angeles: SAGE, 2009), p. 21.

<sup>491</sup> Mercer, p. 124.

<sup>492</sup> Vassal and Daynes-Diallo, pp. 61-64.



when other regulatory frameworks are silent on a given subject. This approach is particularly beneficial when museums are confronted with a specific problem, where it may be instructive to extrapolate ethical conduct from similar situations and apply it to another institutional context.<sup>493</sup> The circumstances are not identical in every respect, yet there is generally enough overlap in the work of the Armouries and comparable institutions for certain lessons to be transferrable. Even so, external consultation cannot cover every eventuality that arises in the course of institutional operations, especially in a more specialist field such as weapons management. The reality is that the ethics of museum practice, collections stewardship, and weapons use are continuously shifting.<sup>494</sup> A comparative approach may not always suggest a definitive course of action. But it does at least constitute a valuable body of experience that can be consulted in difficult situations. In an ever-changing museological landscape, there is much the Armouries' registrar staff can gain from engaging in sustained dialogue with alternative examples of practice. After all, they need to draw on every available resource when negotiating the considerable challenges involved in facilitating access to its weapons collections.

As a museum with a long history of managing weapons, the Armouries' past exploits should provide a wealth of guidance on what constitutes ethical conduct. This is true to a certain extent, but it is not as simple as its registrar staff copying directly from past examples of institutional practice. Instead, the process of internal self-reflection is incremental, more often prompted by a routine occurrence or an everyday conversation than a major upheaval.<sup>495</sup> Take the valuation of objects for insurance purposes. Establishing the right value for an item can be challenging, as the Armouries has to balance the need to ensure appropriate cover for its weapons holdings with its duty as a public body to be prudent with taxpayer money. Staff discussion on this issue has revealed the lack of existing guidance and will likely spur the development of new institutional procedure.<sup>496</sup> Where the most ethical course of action is unclear in weapons management, the standard approach is to consult the Armouries' existing policy. In the event its existing framework does not suffice, it is the responsibility of its registrar staff remedy the situation. As such, best practice in the use of weapons collections gradually evolves in response to the accumulated lessons of routine work. This affirms the idea

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<sup>493</sup> Marstine, Dodd, and Jones, p. 79.

<sup>494</sup> McKnight, interview, 22 February 2023, pp. 13-14.

<sup>495</sup> Royal Armouries, *Collections Policy Framework*, p. 4.

<sup>496</sup> Bell, interview, 1 August 2022, p. 13.

that ethical behaviour is fundamentally contingent by nature, which has gained sizable traction in museum studies.<sup>497</sup> In this reading, perceptions of ethical conduct are held to be products of their time that innately reflect prevailing assumptions and practices. As advances are made in fields linked to collections management – material science, hazard awareness, conservation – notions of ethical conduct adjust to the new standard.<sup>498</sup> This is why professional codes of codes need to be revised and reissued periodically. It also limits the value of past institutional actions as ethical blueprints for the Armouries’ registrar staff. What was seen as normal practice in weapons management just a few years ago might no longer be appropriate. This is not to say that the Armouries can learn nothing from its previous endeavours, just that newer precedents will be of greater use. The immediacy of the ‘At the Sharp End’ exhibition, for instance, means it currently acts as an instructive institutional model for audience engagement with weapons. The Armouries addressed a number of live issues during its development: the presentation of modern weapons collections, the exploration of their criminal use, the feasibility of co-curation, and the documentation of decision-making processes.<sup>499</sup> It may be too soon to fully appreciate the legacy of this display, but efforts are already underway to re-evaluate the use of its weapons collections in light of the experience. If the Armouries is to meet the shifting conventions of weapons management, its registrar staff have to continually review, rethink, and revise the parameters of its institutional practice.

Although the Armouries is unique in its custodianship of the national collection of arms and armour, it is far from the only institution to possess weapons. Fifteen other museums are named directly by the legislation underpinning the Museum Firearms Licence, and even this represents just a fraction of the total.<sup>500</sup> It might thus be assumed that the practices adopted by these comparable institutions could serve as potential examples for the Armouries’ registrar staff. But again, this is complicated by a number of factors. The first is a prosaic matter of expertise. As the national museum of arms and armour with its longstanding experience, the Armouries generally acts as a model of ethical weapons management for other museums rather than vice-versa.<sup>501</sup> It may not necessarily hold all the answers, but its routine engagement with these challenging collections means that its staff lead the field in many areas. There are also deep-seated

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<sup>497</sup> Marstine, p. 8.

<sup>498</sup> Kaines, interview, 1 August 2022, p. 5.

<sup>499</sup> Robson, interview, 18 July 2022, pp. 9-10.

<sup>500</sup> *Firearms (Amendment) Act 1988*, p. 18.

<sup>501</sup> Bell, interview, 1 August 2022, pp. 11-12.

structural forces militating against the direct emulation of other museums, as ethical conduct is as contingent on the institutional setting as the time period. Perceptions of the appropriate treatment of weapons collections are shaped by a combination of actors unique to every museum, such as its guiding mission, governance apparatus, financial backing, and departmental structure.<sup>502</sup> What might be considered a suitable course of action by one museum may not suit the Armouries' particular needs. Its difference in approach to IWM on the cabling of displayed firearms is an instructive example of this principle (see Chapter 2). Ethical practice has to accommodate institutional differences. While it may be amiss for the Armouries to fully imitate external models of weapons management, its personnel can still gain much from less prescriptive forms of exchange. Professional dialogue is vital to the conceptualisation of ethical practice. The Armouries' staff regularly discuss the challenges surrounding weapons collections with colleagues from related institutions, including IWM, the National Army Museum, and numerous regimental museums.<sup>503</sup> In reality, these conversations primarily focus on their practical management – security, safeguards, storage – rather than any explicit consideration of their ethical import. After all, these are routine concerns that preoccupy museums registrars on a daily basis (see Figure 1). Yet, by working through these basic processes together, some semblance of understanding emerges from the patchwork of discourse among museum practitioners that routinely manage weapons collections.<sup>504</sup> It may not be appropriate to codify these exchanges, but these informal networks of specialists provide an opportunity to debate the value of existing strategies. An expansion of regular dialogue could benefit all custodians of cultural weapons collections, provided that institutional variations are acknowledged and respected. The Armouries' registrar staff are thus key contributors to a dynamic professional discourse around the ethical use of these restricted objects.

Exchanges about weapons management also extend beyond the museum sector. Under certain circumstances, the Armouries heeds the example of other professions that regularly engage with weapons. This broad outlook has conceptual support, as certain works have advocated the use of non-museum case studies to aid ethical decision-making within the sector.<sup>505</sup> Of course, the emulation of external practice is beset by the

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<sup>502</sup> Robson, interview, 18 July 2022, pp. 13-14; Bell, interview, 1 August 2022, p. 11.

<sup>503</sup> Kaines, interview, 1 August 2022, p. 4.

<sup>504</sup> Marstine, pp. 19-20.

<sup>505</sup> Marstine, Dodd, and Jones, pp. 74-75.

same issue of contingency as following the example of other museums, which is only exacerbated by the convergence of distinct professional contexts. But in similar fashion, the collaborative experience of working through the intricacies of weapons management can influence the Armouries' approach. Revisiting the 'At the Sharp End' exhibition is instructive in this regard. The standard treatment of weapons entering police possession could hardly be more different from a museum approach, enacting no provisions for preservation or access beyond their use as judicial evidence. Not only was it possible to reconcile these divergent expectations in the event, but the Armouries' collaboration with WYVRU has even provided a blueprint for the sensitive portrayal of its modern weapons holdings.<sup>506</sup> Sometimes it takes the intersection of distinct professional outlooks to address common issues in ways that neither party could have envisioned in isolation. Not all of the Armouries' external relationships require the mediation of such divergent approaches. Risk management, for example, is one area where the interests of the Armouries and non-museum custodians of weapons collections closely align. This is certainly evident in the Armouries' operation of the NFC. Subject to Service Level Agreements with numerous law enforcement agencies, engagement with this collection generally follows Ministry of Defence practice.<sup>507</sup> Through this arrangement, its official standards have been integrated into the Armouries' procedures, to the extent that it is hard to discern their initial contribution. Despite its institutional significance, however, this example is anomalous as most inter-institutional dialogue on weapons management remains a two-way exchange. Indeed, the Armouries' collections staff are often able to leverage these relationships in support of institutional objectives. They are currently benchmarking the Armouries' security apparatus against comparable collections to back a modest expansion in access to its most restricted firearms holdings.<sup>508</sup> These efforts are still in progress, but it seems a sound strategy to draw favourable comparisons with other established institutions. As representatives of an acknowledged leader in weapons management, the Armouries' registrar staff are well placed to engage in discussion with the numerous authorities invested in its rigorous implementation.<sup>509</sup> It may not be possible to reach universal consensus on every conceivable issue, but any clarification

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<sup>506</sup> Robson, interview, 18 July 2022, p. 10.

<sup>507</sup> Kaines, interview, 1 August 2022, p. 3.

<sup>508</sup> Bell, interview, 1 August 2022, p. 12.

<sup>509</sup> Royal Armouries, *Corporate Plan 2023-2028*, pp. 1-2.

of existing ambiguities or debates benefits all those involved. Once again, the results of active collaboration feed into the Armouries' overall conception of ethical practice.

The ethics of weapons stewardship has generated a dynamic and expansive discourse. Instead of relying on static case studies, the Armouries' registrar staff directly participate in the development of ethical practice through their work. Where they do consider other models of weapons management, they pursue active dialogue and ongoing reflection rather than consulting fixed reference points.<sup>510</sup> One reason to favour this approach is that the value of case studies is hindered by the contingency of museum ethics. As best practice in collections management varies across time period, collection type, and even institutional setting, the Armouries' registrar staff have to be discerning in the processes they emulate.<sup>511</sup> Better to gradually bridge these differences through conversation and mediation than to impose procedures inappropriate to the Armouries' current needs. If institutional specificity works against the formulation of a definitive model of ethical weapons management, then the interconnected nature of the field improves its prospects. The Armouries already maintains strong working relations with other weapons custodians for numerous reasons: Ministry of Defence (Service Level Agreements), the police (licensing arrangements), and other museums (object loans). The diverse groups that the Armouries' collections staff engage with in the course of their work enables them to observe prevailing standards and major developments across the field. Sustained practical cooperation can thus help to foster common understanding of proper conduct, even if the subject of ethics is not explicitly broached. However, codifying these organic notions of ethical practice is not a simple process. Standards of this kind rely on consensus, which is not always feasible or even desirable.<sup>512</sup> Combined with the issue of contingency, common acceptance of a set of definitive guidelines for weapons management seems unlikely – let alone an appropriate means of enforcement. The opportunities for dialogue are also constrained. The demands of everyday practice limit the ability of the Armouries' registrar staff to seek further guidance, as their heavy workload is not conducive to sustained ethical discussion.<sup>513</sup> Creating infrastructure for systematic communication is a major undertaking, which requires substantial input from those who stand to benefit. Even with these caveats, the value of greater dialogue across

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<sup>510</sup> Kaines, interview, 1 August 2022, p. 4.

<sup>511</sup> McKeen, p. 17.

<sup>512</sup> Marstine, pp. 6-7.

<sup>513</sup> Case, pp. 15-17.

institutional, professional, and regulatory contexts around the challenges of managing weapons collections remains evident. It is normally prudent to gain a second or third opinion on a difficult issue. Many of the Armouries' personnel think that these conversations should be expanded, potentially by harnessing professional bodies like UKRG and the European Registrars Group.<sup>514</sup> Given their prominence within many of these overlapping networks, the Armouries and its staff are well placed to participate in ethical discourse on weapons management throughout the museum sector and beyond.

### **Philosophical Ethics: Values and Principles**

While museums may harness sources of ethical guidance to resolve specific operational dilemmas, it is clear that the reach of ethics goes much deeper. As institutions wedded to public service, museums are expected to adopt an ethical approach in everything they do.<sup>515</sup> Neither professional codes of ethics nor institutional comparisons can anticipate every possible situation encountered during the use of museum weapons collections, as their scope is finite. The Armouries' registrar staff thus draw on another source of ethics to guide their everyday conduct – core institutional values. Its approach to weapons management is guided by three foundational principles: to provide public access to its collections, to preserve its objects for posterity, and to mitigate the risks presented by its holdings.<sup>516</sup> The first two purposes are common to all museums, exemplified by the tension between access and preservation that has characterised all of the examined museological frameworks to some degree. The third is not quite as prevalent, but it is a paramount responsibility of all custodians of weapons collections. The Armouries must observe all three of these major objectives, but they do not coexist comfortably in practice. In fact, the difficulties involved in weapons management predominantly stem from the perennial conflict of these underlying values, which does not appear to have been articulated in the available literature. To understand this fundamental friction, it is necessary to explore the philosophical basis of these positions. Museum ethics is widely understood to constitute a form of applied ethics, the translation of established ethical theories to practical situations.<sup>517</sup> Accepting this premise, it becomes possible to map

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<sup>514</sup> Robson, interview, 18 July 2022, pp. 15-16; Bell, interview, 1 August 2022, p. 11; Kaines, interview, 1 August 2022, p. 5; McKnight, interview, 22 February 2023, p. 8.

<sup>515</sup> Hans-Martin Hinz, 'ICOM Turns 70: Ethics and the Value Creation Role of Museums', in *Museums, Ethics and Cultural Heritage*, ed. by Bernice L. Murphy (London: Routledge, 2016), pp. 3-8 (p. 8).

<sup>516</sup> Robson, interview, 18 July 2022, pp. 4-5.

<sup>517</sup> Stark, pp. 27-28.

the Armouries' guiding principles onto existing philosophical traditions. One of the key principles underpinning museum practice is utilitarianism, the pursuit of the maximum possible 'good' in a given situation.<sup>518</sup> In essence, the three main values informing weapons management at the Armouries are all derived from this notion. However, the incompatibility of their definitions of a 'good' outcome and their intended beneficiaries ultimately generates tension between them. This dissonance is further compounded by the fact that these obligations are enshrined across the prevailing legal framework. The Armouries' regulatory assemblage thus commands it to provide the greatest benefit to its audiences while also minimising any potential for harm, both to its weapons holdings and to all individuals engaging with them.<sup>519</sup> The task of reconciling these competing obligations is easier said than done, as the right approach is not always self-evident. Effective management of the Armouries' weapons collections entails striking an appropriate compromise between these major ethical commitments. The challenge for its registrar staff is determining where this equilibrium should lie.

One of the defining ethical principles underpinning weapons management at the Armouries is the need to mitigate risk to individuals. While all museums must ensure personal safety, the elevated potential of weapons to cause harm greatly amplifies this obligation. This does constitute an expression of utilitarianism, but one that privileges the avoidance of harm rather than the maximisation of beneficial outcomes.<sup>520</sup> The Armouries must therefore build robust safeguards into its operations to neutralise the risk presented by its stewardship of weapons collections. This duty manifests itself in a number of forms, which the Armouries' registrar staff must address concurrently. First, they have to consider the potential damage that its weapons could inflict on society as a whole if their security were compromised. This civil responsibility also has legislative substance, as no less an authority than the *Firearms Act 1968* is designed to 'protect public safety'.<sup>521</sup> As such, the Armouries must work hard to prevent its weapons from entering the wrong hands. Its administration of the NFC demonstrates this commitment. In addition to a robust physical security apparatus, the Armouries does not publicise its location given the number of the modern firearms held there.<sup>522</sup> The obligation to

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<sup>518</sup> Fenna Schmidt, 'Codes of Museum Ethics and the Financial Pressures on Museums', *Museum Management and Curatorship*, 11 (1992), 257-68 (p. 258).

<sup>519</sup> Royal Armouries, *Collections Access Policy*, p. 2.

<sup>520</sup> Tim Mulgan, *Understanding Utilitarianism* (Stocksfield: Acumen, 2007), p. 61.

<sup>521</sup> *Firearms Act 1968*, p. 1.

<sup>522</sup> Robson, interview, 18 July 2022, p. 6.

uphold public safety means that no aspect of its security framework can be overlooked. In a more immediate sense, there is also the need to prevent direct physical harm. There would be serious fallout if anyone was injured or worse while under the Armouries' charge. The inviolable nature of personal welfare is reinforced by the prevailing legal framework, as the *Health and Safety at Work Act 1974* states its intention to protect against any 'risks to health and safety'.<sup>523</sup> Yet, the agency of the paramount ethical imperative to avert harm also extends well beyond the legislative sphere. An axiom of collections handling at the Armouries is not to point weapons at another person, an essential safety measure that is nowhere outlined in law.<sup>524</sup> The primacy of individual wellbeing requires a proactive approach. In a similar vein, the Armouries is responsible for alleviating the emotional distress that its weapons holdings can trigger. This duty is nowhere codified in law, yet it has become a serious concern in recent years all the same. The Armouries is keenly aware of the need for careful public messaging, whose role is deemed urgent enough to feature regularly at executive meetings.<sup>525</sup> It can be challenging to negotiate the charged debates around weapons, so it is important to approach them in an inclusive and sensitive manner. Overall then, the ethical duty to avoid harm in its various forms is a prime consideration when facilitating access to museum weapons collections. Its claim is further reinforced by the underlying thrust of weapons law. It is thus the task of the Armouries' registrar staff to develop management strategies characterised by security, safety, and sensitivity.

Alongside the obligation to minimise the threat posed by its weapons holdings, the Armouries has a corresponding duty of care to the objects themselves. Unlike their heightened safety needs, however, the logic of preservation applies equally to weapons as to any other collection. Professional guidance dictates that all museums should do their utmost to safeguard tangible cultural heritage in the interests of future users.<sup>526</sup> This reflects a utilitarian premise that the potential benefit derived from any interaction with an item will be diminished if its material integrity is compromised. With a few exceptions – namely working, handling, and teaching collections – weapons are subject to this perpetuation like any other accessioned museum object. Where the Armouries' collections differ from many others is that their preservation is codified in law. The

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<sup>523</sup> *Health and Safety at Work etc. Act 1974*, p. 1.

<sup>524</sup> Kaines, interview, 1 August 2022, p. 8.

<sup>525</sup> Bell, interview, 1 August 2022, p. 2.

<sup>526</sup> Museums Association, *Code of Ethics*, p. 2; International Council of Museums, *ICOM Code of Ethics*, pp. 7-8.



*National Heritage Act 1983* requires the Armouries to ‘care for’ and ‘preserve’ its weapons holdings, as well as to maintain an accompanying record.<sup>527</sup> The 1983 Act does not specify any means of practical implementation, however, leaving its registrar staff to embed this principle into its institutional procedures. While there is no formal requirement to minimise the use of moving parts on museum objects, for instance, the Armouries prescribes this measure for its accessioned historical firearms to maintain their condition.<sup>528</sup> This example highlights the importance of preventive conservation, a holistic strategy to forestall the deterioration and loss of material culture through the maintenance of a safe environment. Where weapons management is concerned, the Armouries has to reconcile this general duty of collections care with the need to avoid harm. This is often a simple process, as many of the safeguards employed by museums help to ensure the safety of both individuals and objects.<sup>529</sup> Returning to a previous example, the irresponsible handling of weapons risks damaging the object in question as well as endangering anyone present. The Armouries’ ban on pointing weapons at other people helps both to preserve its objects and to uphold standards of personal safety – objectives that regularly overlap in practice. However, this synergy is not a guaranteed outcome. Take the removal of explosive material from the Armouries’ historical artillery shells; the difficult decision was made to materially alter its accessioned objects in order to reduce the risk of an explosion to safe and legal levels.<sup>530</sup> On the rare occasions that personal safety and object integrity conflict in weapons management, the former must ultimately take precedence. Fortunately, such cases are very much an exception. In general, the strengthening of the Armouries’ safeguards works to protect individuals and its weapons holdings in conjunction. It must continue to display the highest standards of conduct in both areas as a steward of the national collection.

The implementation of a secure programme of weapons management at the Armouries is greatly complicated by its public obligations. Community engagement is a defining feature of modern museums, as it is now almost universally accepted that their collections are maintained for the benefit of society at large.<sup>531</sup> Public access is thus a major concern of contemporary collections management. From a utilitarian perspective,

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<sup>527</sup> *National Heritage Act 1983*, p. 11.

<sup>528</sup> Bell, interview, 1 August 2022, p. 4.

<sup>529</sup> Catharine Hawks and Robert Waller, 'A Tale of Two Systems: Synergy in Managing Risks to People and to Collections', *Collections: A Journal for Museum and Archives Professionals*, 9 (2013), 115-24 (p. 123).

<sup>530</sup> Kaines, interview, 29 November 2021, pp. 11-12.

<sup>531</sup> International Council of Museums, 'Museum Definition'.

a museum should seek to improve both the quality and quantity of opportunities to engage with its collections to maximise their overall benefit.<sup>532</sup> This duty exerts particular sway over the Armouries as a national museum. Given that its work is predominantly funded from the public purse, the obligation to provide access to its weapons holdings in various forms is enshrined in its constitutional arrangements.<sup>533</sup> The Armouries has clear ethical and legal mandates to increase public engagement with its weapons collections. However, this presents its registrar staff with the challenge of squaring this commitment with the equally pressing demands of safety and security. The moral imperative to mitigate the risks associated with its weapons collections prevents the Armouries' adoption of certain access arrangements embraced by other museums. Open storage facilities have proliferated in recent years, for example, as they are seen to offer a greater degree of access to collections that are otherwise out of reach for most audiences.<sup>534</sup> With the Armouries' weapons collections, however, their stores require such a high level of security that open storage would be incredibly difficult to implement within appropriate risk parameters.<sup>535</sup> The need to avoid harm again takes precedence, so its staff have to be selective in their methods for achieving greater public access. Despite these regulatory constraints, the Armouries is staunchly committed to improving the accessibility of its weapons collections. This is apparent even in the case of 'prohibited persons'. Although these individuals are not allowed direct access to certain weapons under law, the Armouries' registrar staff are prepared to explore suitable alternatives on a case-by-case basis.<sup>536</sup> It would be easy to justify a blanket prohibition in the interests of security, but the Armouries' duty to make its collections accessible to all urges a more nuanced approach. Its registrar staff have to make many similar accommodations on a routine basis in order to balance the competing claims of public engagement and occupational safety. Even though the Armouries has to meet the rigorous conditions of weapons management, it is still expected to place its resources at the disposal of the community like any other museum. Ultimately, this tension has profound implications for the operational role of its registrar staff.

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<sup>532</sup> Tim Ambrose and Crispin Paine, *Museum Basics*, 4th edn (London: Routledge, 2018), pp. 273-74.

<sup>533</sup> *National Heritage Act 1983*, pp. 11-12.

<sup>534</sup> Gaëlle Crenn, "'Storage Exhibitions' in Permanent Museum Collections: Interpretation, Critical Reflexivity and Democratisation", *Museum International*, 73.1-2 (2021), 88-99 (p. 90).

<sup>535</sup> Robson, interview, 18 July 2022, pp. 5-6.

<sup>536</sup> Bell, interview, 1 August 2022, p. 3.

Much of the complexity involved in managing museum weapons collections thus appears to stem from the jarring intersection of these three major obligations. The Armouries' duty to avoid harm, to preserve its objects, and to enable public access all strongly impact the treatment of its weapons holdings. Where these principles broadly align, as in the case of mitigating risk and safeguarding collections, the Armouries encounters few problems. It can take all necessary measures to fulfil these 'absolute' values.<sup>537</sup> However, difficulties arise when the realisation of these principles is less compatible. Measures designed to reduce the threat from weapons collections often hinder the expansion of public access, and vice versa.<sup>538</sup> The Armouries has to negotiate this tension to the best of its ability. Even where the underlying justification is essentially the same, these values can still work against one another if the intended beneficiaries differ. The expansion of access and the preservation of collections both seek to maximise 'good' in terms of public engagement with the Armouries' weapons – for current and subsequent audiences, respectively. Yet, the advancement of the one generally inhibits pursuit of the other. This has spurred persistent efforts within the cultural sphere to seek an appropriate balance between the claims of the present and the future, an endeavour underpinned by the premise of intergenerational responsibility.<sup>539</sup> The Armouries' registrar staff undertake the arduous task of reconciling these competing interests during the routine delivery of weapons management. Their overall approach is to first minimise the potential harm caused by these collections, but then do everything possible to optimise both their access and their preservation within these parameters.<sup>540</sup> This serves as a general overview, but in practice the nuances of each situation require slightly different compromises and accommodations to be made. In this work, the Armouries' registrar staff are not entirely unsupported. The prevailing regulatory assemblage does much to substantiate the major demands of public weapons collections. Whether manifested as weapons law, museological standards, or ethical discourse, these frameworks provide a series of minimum benchmarks for the practice of weapons management. However, the potential for ambiguity is ever present in the grey areas between these frameworks. This obliges the Armouries' registrar staff to

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<sup>537</sup> Edson, p. 72.

<sup>538</sup> Adams, p. 114.

<sup>539</sup> Rodney Harrison, 'Heritage as Future-Making Practices', in *Heritage Futures: Comparative Approaches to Natural and Cultural Heritage Practices*, ed. by Rodney Harrison and others (London: UCL Press, 2020), pp. 20-50 (p. 25).

<sup>540</sup> Kaines, interview, 1 August 2022, p. 11.

make regular ethical judgements in the course of their everyday practice.<sup>541</sup> These tensions will persist while the Armouries remains both a weapons custodian and a national museum, whose respective duties are codified in the discordant bodies of weapons law and cultural heritage law. The former restricts access to weapons collections, while the latter urges its expansion. As long as the Armouries is expected to fulfil these contrasting functions, its registrar staff will be called upon to resolve the practical challenges that result from this clear operational contradiction. Every decision and action they take is ultimately calculated to maintain this careful balancing act.

### **Beyond Regulation: The Dilemmas of Weapons Management**

‘There is no part of the museum that is free from ethical implications.’<sup>542</sup> This view of museum practice equally applies to the stewardship of weapons collections. Few aspects of weapons management at the Armouries are untouched by the influence of ethics in its various guises. Codes of ethics provide a series of professional benchmarks for the appropriate treatment of museum collections; the consultation of comparable practice helps to address common concerns; and deep-rooted ethical values inform institutional approaches to weapons.<sup>543</sup> The complex workings and interactions of these ethical discourses, however, can make their respective impact difficult to determine in practice. The Armouries’ registrar staff acknowledge their general influence over routine work, even if they do not often draw upon them explicitly.<sup>544</sup> Their task is complicated by the fact that the Armouries has to satisfy two distinct ethical traditions, museum practice and weapons management. While there is a clear baseline for its professional duties as a museum – the ICOM and MA Codes of Ethics – no equivalent ethical framework appears to exist for weapons management that addresses its particular challenges.<sup>545</sup> In the absence of relevant codified guidance, less tangible models of ethical practice can suffice. There are the lessons drawn from the Armouries’ long history of weapons management, which have been gradually refined through everyday use. Its registrar staff can also enter into dialogue with museums or other custodians of weapons collections, whose expert personnel are valuable contacts and collaborators. If neither of these

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<sup>541</sup> Robson, interview, 18 July 2022, p. 7.

<sup>542</sup> Besterman, p. 432.

<sup>543</sup> Marstine, Dodd, and Jones, pp. 78-79.

<sup>544</sup> Robson, interview, 18 July 2022, p. 3.

<sup>545</sup> Bell, interview, 1 August 2022, p. 10.

options help to determine a suitable approach to the Armouries' weapons collections, then its staff have to weigh up the competing claims of safety, preservation, and access. The relative significance of these parameters continuously fluctuates, hindering the formulation of an agreed standard of weapons management. An ethical course of action is contingent on countless factors and decisions.<sup>546</sup> Beyond the general guidance it follows as a member of the museum community, the Armouries must decide for itself the strategies appropriate to its institutional obligations. Its registrar staff can refer to applicable models of ethical practice for assistance, but they ultimately make the final call when reconciling the competing claims around the use of its weapons collections.

Of course, the contemporary manifestations of ethical conduct that inform weapons management at the Armouries have not been developed in a vacuum. They are an integral part of the regulatory assemblage governing its collections, developed in sustained dialogue with the corresponding legislative and operational structures. Whether expressed in the mutual affinity of ethical codes and professional standards, the dissemination of best practice across the museum sector, or the codification of fundamental values in law, the ethics of weapons management is entangled with its wider regulation. Their coterminous evolution has forged many connections between these structures, in effect producing a composite assemblage that blurs the lines between the various checks on institutional practice. Like any museum collection, management of the Armouries' weapons holdings requires the simultaneous observation of legal, professional, and ethical frameworks.<sup>547</sup> This thesis has sought to evaluate the system in its entirety, as isolating the impact of any single element could produce a distorted impression of the occupational parameters of its registrar staff. Maintaining a holistic approach is essential, as the Armouries' registrar staff do themselves.<sup>548</sup> It is also important to understand institutional thinking on the interplay of these frameworks, as this informs their application to routine practice. Overall, the Armouries conceptualises its duties as a hierarchy of three ascending planes. Firstly, there is self-regulation of its institutional values and behaviours; then above that sit the sector frameworks, namely professional standards and codes of ethics; at the apex, there are the various expressions of statute law.<sup>549</sup> This scale broadly corresponds to the severity of a potential infraction,

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<sup>546</sup> Stark, pp. 31-32.

<sup>547</sup> Ulph, 'Museums Association's Code of Ethics', pp. 155-56.

<sup>548</sup> McKnight, interview, 22 February 2023, p. 11.

<sup>549</sup> Kaines, interview, 1 August 2022, p. 11.

ranging from internal disciplinary action through professional censure up to criminal prosecution. In order to avoid any institutional infringement, the provisions operating at each level are designed to comply with the requirements of those above it. In this way, the Armouries' legal, professional, and ethical duties are written into its institutional policy framework as a matter of course.<sup>550</sup> This does spare its registrar staff from having to memorise every aspect of the extensive operational apparatus surrounding weapons management. Nevertheless, it is important to maintain a solid working knowledge of the various constituent frameworks that form the original source material, whether to resolve unforeseen difficulties or to review institutional processes. There is no substitute to engaging with the regulatory assemblage in all its complexity.

All use of the Armouries' weapons collections is caught between the conflicting claims of regulation and access. As the national museum of arms and armour, it cannot divest itself of either duty. Its possession of weapons demands the adoption of robust safeguards, while its receipt of taxpayer funding requires the facilitation of meaningful public engagement with every part of its collection.<sup>551</sup> Given that both obligations are reinforced by the prevailing legal, professional, and ethical frameworks, some form of reconciliation is necessary. This tension pervades the Armouries' operations, but its registrar staff spearhead this effort as the chief coordinators of regulatory compliance (see Figure 1). As the regulatory apparatus cannot anticipate every potential eventuality of weapons management, the Armouries' registrar staff have to be prepared to consult the available material and come to a reasoned decision.<sup>552</sup> There will always be a need to exercise individual judgement in the management of museum weapons collections, given the array of actors and frameworks that must be satisfied. The same applies when the Armouries seeks to utilise its collections in novel ways, such as the greater social emphasis of the 'At the Sharp End' exhibition. Innovation creates new opportunities but also new challenges, so the balance between regulation and access must be reconfigured anew. The Armouries' registrar staff also have to plan for future changes to the apparatus regulating its weapons collections. As legislative, professional, and ethical contexts continue to evolve, institutional practice will need to keep pace with them to meet the needs of a changing society.<sup>553</sup> Any attempt to predict the future course of

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<sup>550</sup> Simmons, 'Collections Management Policies', pp. 32-33.

<sup>551</sup> Janet Ulph, 'Frozen in Time: Orphans and Uncollected Objects in Museum Collections', *International Journal of Cultural Property*, 24 (2017), 3-30 (p. 8); Royal Armouries, *Collections Access Policy*, p. 2.

<sup>552</sup> Robson, interview, 18 July 2022, p. 7.

<sup>553</sup> Black, p. 3.

weapons management can only be speculative, but it is nonetheless prudent for the Armouries to monitor and anticipate the challenges of maintaining its collections of arms and armour. The ongoing fallout from the Plymouth shootings of August 2021 have certainly demonstrated that weapons remain a highly contested topic in British society.<sup>554</sup> A proactive and sensitive approach to the live issues of weapons stewardship will be thus crucial to maintaining the Armouries' ascendant position in the field. Whatever the future may hold for the regulation of museum weapons collections, the role of its registrar staff is closely bound up in the fate of the prevailing assemblage.

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<sup>554</sup> House of Commons, *Hansard's Parliamentary Debates: The Official Report* (21 February 2023, vol. 728, cols. 155-63) (London: Hansard).

## Chapter 4: Access, Risk, and the Onion Principle

Our default positional mindset, I would say, is that we want to facilitate access to the collection. We want to accept loan requests or visit requests if possible and if we can do that in a secure and safe way, where it's within our policies and procedures, and it's not a risk to our collection or individuals. In my mind, I'm always approaching it in terms of, yes, we want to do this, but we can only do it if these conditions can be met, and obviously we can't afford to take risks when it comes to safety.<sup>555</sup>

On 26 January 2023, the Royal Armouries hosted the third Weapons in Society (WiS) conference, one of the first large-scale academic events held on its premises following the COVID-19 pandemic. Alongside the usual programme of talks and networking breaks, the Armouries organised opportunities for the attendees to engage with the national collection of arms and armour.<sup>556</sup> The conference delegates were given a tour of its newest permanent display 'Firefight: The Second World War' by the Curator of Firearms (Figure 7). There was also an object handling session where the attendees were able to inspect and handle a selection of the Armouries' collections first-hand (Figure 8). Four of the eight objects were weapons: a medieval Japanese blade, a prop sword, a dagger, and a flintlock pistol.<sup>557</sup> These forms of public engagement may appear straightforward on the surface, but a substantive operational apparatus quietly underpins their delivery. Given the expansive remit of registrar practice (see Figure 1), this is a process in which the Armouries' registrar staff are closely involved. Consistent with the principles of assemblage theory that have so far guided this thesis, a complex series of interconnected decisions and actions determine the provision of access to museum collections.<sup>558</sup> The introduction of weapons further complicates this task, as all engagement with these objects must conform to the formidable regulatory edifice surrounding their possession and use that has been examined by the first three chapters. At the Armouries, its registrar staff play a central role in preparing these collections for public access and ensuring that the demands of weapons regulation are observed throughout this process. The impact of the resulting policies and procedures can be discerned in the access arrangements showcased at the WiS conference.

<sup>555</sup> McKnight, interview, 22 February 2023, p. 9.

<sup>556</sup> Royal Armouries, 'Weapons in Society' <<https://royalarmouries.org/event/weapons-in-society/>> [accessed 16 January 2023].

<sup>557</sup> Royal Armouries, 'Collections Security: Event/Object Use Application - Weapons in Society III' (unpublished internal document, 2023), p. 1.

<sup>558</sup> Matassa, *Museum Collections Management*, p. 242.





**Figure 7: Firefight Gallery – Royal Armouries**  
Photographed by the author, 26 January 2023.



**Figure 8: Handling Session, Weapons in Society**  
Photographed by the author, 26 January 2023.

All forms of public programming involving the Armouries' weapons collections must conform to the legislative requirements set out in Chapter 1. These constitute a baseline standard that its registrar staff ensure is observed at all times, whether in storage, on display, or during public use. The fact that the legal regulation of firearms and edged weapons are predicated upon physical possession, for example, strongly determined the nature of engagement offered at WiS.<sup>559</sup> The tour of the Firefight gallery was straightforward from this perspective. The objects remained in their display cases throughout the event, removing the possibility of unintentional physical possession by any visitor. The conference delegates benefited from greater intellectual access through dialogue with the curator rather than direct access to the exhibited weapons.<sup>560</sup> Here, no extra measures were required to meet the Armouries' legal obligations. The handling session, however, as an activity based around physical possession, was regulated to a much greater degree. Given that the workshop included both offensive weapons and firearms, the Armouries' staff had to comply with the terms of these distinct bodies of weapons law. Possessing any of the edged weapons used in the handling session would

<sup>559</sup> Crown Prosecution Service, 'Violent Crime' <<https://www.cps.gov.uk/crime-info/violent-crime>> [accessed 25 March 2021].

<sup>560</sup> Royal Armouries, *Access Policy* (Leeds: Royal Armouries, 2022), p. 2.

normally be forbidden in public as they are all articles with blades or points. However, possession of these objects as part of a supervised museum event can legitimately be interpreted as a ‘good reason’ and is thereby exempted from this provision.<sup>561</sup> As no other legal conditions directly apply to these edged weapons, the Armouries did not need to implement any further safeguards. However, the regulations enforced on the single firearm included in the session were more substantial. The Armouries may be able to possess all manner of firearms by virtue of its Museum Firearms Licence, but it cannot allow certain individuals to do so – namely convicted offenders and young people under fourteen.<sup>562</sup> It is the responsibility of the Armouries’ registrar staff to ensure that these restrictions are observed. In the case of the WiS conference, the process of screening attendees began long beforehand. Its preliminary communications stressed that anyone who had previously received a custodial sentence greater than three months may not be able to access the collection, so delegates would only be allowed to partake in the handling session on presentation of photographic identification and proof of address.<sup>563</sup> The prior clarification of these access conditions was important for two reasons. It gave prospective attendees advanced warning of the need to prove their legal clearance to engage with firearms and it allowed any ‘prohibited person’ to contact the Armouries to explore alternative options in good time. At the event itself, the delegates confirmed they were not ‘prohibited persons’ under the *Firearms Act 1968*, then their details and credentials were verified by multiple collections staff.<sup>564</sup> This information was recorded on a standard form (Figure 9) to provide concrete evidence of the Armouries’ efforts to fully comply with the requirements of firearms law as a licensed organisation. The legal controls imposed on even a single weapon can profoundly shape the operational measures underpinning their use in museum programming.

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<sup>561</sup> *Criminal Justice Act 1988*, p. 94.

<sup>562</sup> *Firearms Act 1968*, pp. 10-12.

<sup>563</sup> Royal Armouries, ‘Weapons in Society’.

<sup>564</sup> Laura Bell, Director of Collections - Royal Armouries (4), interviewed by Stuart Bowes, 7 February 2023, p. 7.

**ROYAL ARMOURIES**

**Access to Research Collections**

PLEASE COMPLETE IN BLOCK CAPITALS

**Contact Details:**

Name:

Address:

Telephone:

Email:

Date(s) of Access (if for more than one day please state the entire period of the visit):

Purpose (please outline the nature of your visit):

I have read the regulations etc. regarding access to the Research Collections. I agree to abide by them and understand that permission will be withdrawn if any part of them is infringed.

I declare that I am not a Prohibited Person under the terms of the 1968 Firearms Act.

Signature:  Date:

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**Staff Use Only:**

**Request to Visit:**

Store 1	<input type="checkbox"/>	Archives	<input type="checkbox"/>
Store 2	<input type="checkbox"/>	Conservation	<input type="checkbox"/>
Store 3	<input type="checkbox"/>	Other (list)	<input type="checkbox"/>

**Proof of Identity:**

Passport	<input type="checkbox"/>	National ID Card	<input type="checkbox"/>
Photo Driving Licence	<input type="checkbox"/>	Other Approved ID (state)	<input type="checkbox"/>

Signed: \_\_\_\_\_ Countersigned: \_\_\_\_\_

Print: \_\_\_\_\_ Print: \_\_\_\_\_

**Figure 9: Access to Research Collections Form**

Photographed by the author, 26 January 2023.

Of course, legislation constitutes just one aspect of the regulatory assemblage that the Armouries had to respect in its preparations for the WiS conference. As an accredited museum, it has an ethical duty to ensure the security of its objects as well as the safety of anyone accessing them.<sup>565</sup> Given the heightened risk surrounding its weapons collections, the Armouries has responded to these professional expectations by enacting further safeguards over and above those required to maintain legal compliance. For example, its Registrar completes a risk assessment of all events to determine the necessary security provisions on a case-by-case basis.<sup>566</sup> The WiS conference was no exception. The tour of the Firefight gallery was deemed to require no extra precautions from this perspective, because it was never the intention to open any cases. While the

<sup>565</sup> Museum Accreditation, *Accreditation Standard*, p. 5.

<sup>566</sup> Royal Armouries, 'Collections Security Procedure' (unpublished internal document, 2022), pp. 3-5.

handling session again required greater preparation, it was actually the inclusion of edged weapons rather than firearms that proved more challenging in this way. From a safety standpoint, a sharp blade poses a more immediate threat than a firearm without ammunition.<sup>567</sup> As such, the Armouries has developed a range of controls that can be tailored to the level of risk involved in the various uses of its weapons collections. The following precautions were observed during the WiS conference: the handling session took place in a private room to retain full control over the space, only half of the objects were weapons to reduce the chance of immediate harm, and numerous trained staff acted as invigilators.<sup>568</sup> Each of these variables was gauged specially for the needs of this event, together forming a suite of measures designed to reduce the potential risk to a viable level. These specific precautions were largely conceived by the Armouries' registrar department, but by no means in isolation. Following discussions between its Registrar and the staff running the event, it was decided that the conference attendees would be divided into two smaller groups for the handling session.<sup>569</sup> Acknowledging the interests of both parties, this arrangement ensured that the number of participants was low enough to be supervised effectively by the available staff in the chosen space. Assessing each use of its weapons holdings on a case-by-case basis thus enables the Armouries to develop a proportionate response to any potential threats while continuing to deliver on its public mandate. The outcome of WiS exemplified the strengths of this approach, facilitating meaningful engagement with the Armouries' weapons collections for the assembled delegates without incident.

The preparations for the WiS conference encapsulate many of the key issues at stake in the use of museum weapons collections, which the Armouries encounters on a routine basis. First of all, this episode highlights the basic expectation that it will provide access to its objects in a variety of ways. Exhibitions and handling sessions constitute just two of the many strategies that museums have developed to foster public engagement with their collections – others include mobile integration, dialogue with staff, behind-the-scenes tours, and open storage.<sup>570</sup> Not all of these approaches are

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<sup>567</sup> Jen Kaines, Head of Collection Services - Royal Armouries (4), interviewed by Stuart Bowes, 8 February 2023, p. 13; Marie Demeroukas, 'Condition Reporting', in *MRM6: Museum Registration Methods*, ed. by John E. Simmons and Toni M. Kiser, 6th edn (Lanham: Rowman & Littlefield, 2020), pp. 249-60 (p. 249).

<sup>568</sup> Katie Robson, Registrar - Royal Armouries (3), interviewed by Stuart Bowes, 7 February 2023, p. 6.

<sup>569</sup> Royal Armouries, 'Collections Security: Weapons in Society III', pp. 1-2.

<sup>570</sup> Emily-Jane Gallimore and Clare Wilkinson, 'Understanding the Effects of "Behind-the-Scenes" Tours on Visitor Understanding of Collections and Research', *Curator: The Museum Journal*, 62 (2019), 105-15 (p. 106).

necessarily appropriate to weapons given their additional regulation, so the Armouries has to adapt them to its institutional circumstances. The example of WiS shows that its approach to the public use of weapons contains two distinct stages. Firstly, the prior screening of the conference attendees to comply with firearms law demonstrates the translation of the Armouries' legal duties into routine practice through their inclusion in its policy framework. Above this baseline, bespoke controls were then implemented to make sure the handling session proceeded safely. The Armouries' professional and ethical obligations can be just as significant as its legal ones, and they often occupy more of its registrar staff's attention in practice.<sup>571</sup> This idea raises another important feature of collections access, even the most comprehensive framework is ultimately implemented by individuals. In the case of WiS conference, the Armouries' procedural apparatus provided a template that its collections staff then refined to fit the event's particular needs. After all, personal agency is equally important to the emergence of cultural assemblages as operational or material actors.<sup>572</sup> The handling session in particular highlights the collaborative nature of this work. The delivery of this single workshop drew on the combined expertise of personnel throughout the Armouries' collections department, curatorial and research staff as well as its registrar team. The latter may officially be responsible for ensuring compliance with its legal and ethical obligations, but they cannot accomplish this task alone.<sup>573</sup> The substantial labour of facilitating legitimate collections access requires the input of numerous occupational groups. The Armouries' registrar staff are keenly aware of their vital role in enabling opportunities for public engagement with its weapons holdings. Their commitment to this work is certainly evident from the opening quotation of this chapter, which underscores the need for robust internal processes to underpin access strategies. On this basis, engagement is a key measure of effective collections management. If this was not the case, it would be much easier to provide the bare-minimum level of access to its weapons collections given the challenges involved. The diversity of the Armouries' public offer is thus a testament to the determination of its registrar staff to realise the fundamental purpose of the national museum of arms and armour.

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<sup>571</sup> Robson, interview, 7 February 2023, p. 9.

<sup>572</sup> Paul Jones and Suzanne MacLeod, 'Museum Architecture Matters', *Museum and Society*, 14 (2016), 207-19 (p. 208).

<sup>573</sup> McKeen, pp. 19-20.

### **Navigating the Regulatory Assemblage**

The contribution of the Armouries' registrar staff to the 2023 WiS conference shows that enabling access to museum weapons collections is rarely a simple endeavour. But before examining its practical intricacies in greater depth, it is important to clarify what access actually entails for the purposes of this thesis. In museum studies literature, it is generally framed as the measures taken by institutions to enable individual and group engagement with their many functions. Championing this notion of access, certain commentators have further affirmed that facilitating community involvement is the primary duty of museums as public spaces.<sup>574</sup> It thus serves as a convenient shorthand for anything related to entry, engagement, or participation in the museum. Access does also have more specific applications. Often, it is expressed as an aspirational goal limited by a series of barriers – physical, sensory, intellectual, financial, emotional, socio-cultural – that all institutions should strive to overcome.<sup>575</sup> The underlying assumption is that access is a multifaceted phenomenon within museums, which can only be realised effectively through coordinated efforts across a range of operational areas. Their collections are a chief focus of this endeavour. Museums proclaim themselves to be custodians of cultural heritage on behalf of society, so it follows that providing public access to their collections constitutes one of their fundamental duties.<sup>576</sup> Indeed, it is a central theme of many of the museological standards outlined in Chapters 2 and 3. Professional expectations are clear on this point, but their realisation nonetheless remains a major undertaking. Aiming to expand opportunities for connecting audiences and objects, the subsidiary field of 'collections access' has thus emerged out of strategies to better facilitate the use of museum holdings.<sup>577</sup> In this way, access has become a central concern of collections management. While it can be achieved in different ways, the overarching objective is to minimise the impediments that separate individuals from museum objects and their related information.<sup>578</sup> It takes considerable internal preparation to connect them in a meaningful capacity that conforms to notions of responsible cultural stewardship. The barriers to this process are often prosaic – how to bring people and objects to the same physical space, for instance – but these are basic questions that museums cannot ignore. Collections departments

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<sup>574</sup> Papadimitriou and others, p. 34.

<sup>575</sup> Mason, Robinson, and Coffield, pp. 103-06; Sandell, pp. 410-11.

<sup>576</sup> Besterman, pp. 436-37.

<sup>577</sup> Keene, p. 9.

<sup>578</sup> Simmons, 'Collection Care and Management', p. 240.



work hard to address the practical ramifications of public engagement. Indeed, many recent professional handbooks present cohesive operational programmes designed to streamline collections access – clear policy documents, staff invigilation, handling procedures, accessible storage facilities, risk assessments, and so on.<sup>579</sup> All of these measures work to enable personal proximity to museum objects. Given that this thesis seeks to explore routine institutional negotiation of the unique barriers to the use of weapons holdings, it thus adopts this narrower notion of ‘collections access’.

Collections access is certainly a prominent theme within the Armouries’ public documentation. Not only does it have a dedicated Collections Access policy, but it also frames the concept in very similar terms to the prevailing literature: ‘physical proximity to objects and intellectual use of information and knowledge relating to them.’<sup>580</sup> Given its situational relevance, this definition of collections access underpins the content of this chapter. There is good reason for the Armouries to provide a clear statement of intent on this subject. As a national museum, it is required to facilitate public access to its collections by law in addition to any professional mandate. The *National Heritage Act 1983* thus stipulates that the Armouries shall carry out the following functions:

- (b) secure that the objects are exhibited to the public,
- (c) secure that the objects are available to persons seeking to inspect them in connection with study or research [...]
- (e) generally promote the public’s enjoyment and understanding of arms and armour, both by means of the Board’s collection and by such other means as they consider appropriate.<sup>581</sup>

Although the term ‘access’ is not mentioned explicitly, these three clauses charge the Armouries with making its collections accessible in various ways. The first two provisions are self-evident, calling for it to foster collections engagement through exhibitions and immediate study, respectively. Direct inspection and display are both longstanding methods for enabling public access to museum collections.<sup>582</sup> They will assuredly remain core engagement strategies at the Armouries while the 1983 Act continues to operate in its current state. By comparison, the third clause is much more expansive in that it does not stipulate a specific form of access. Instead, it calls on the Armouries to be proactive in developing ways to engage audiences with its collections.

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<sup>579</sup> Matassa, *Museum Collections Management*, pp. 229-43; Miller, pp. 85-86; Simmons, ‘Collections Management Policies’, pp. 34-35.

<sup>580</sup> Royal Armouries, *Collections Access Policy*, p. 3.

<sup>581</sup> *National Heritage Act 1983*, pp. 11-12.

<sup>582</sup> Duncan F. Cameron, ‘Museums and Public Access: The Glenbow Approach’, *The International Journal of Museum Management and Curatorship*, 1 (1982), 177-96 (p. 181).

While museums have pioneered a range of methods to achieve collections access beyond display and hands-on interaction, two of the most prominent are lending programmes and digital dissemination.<sup>583</sup> In different ways, both of these approaches enable collections engagement beyond the Armouries' physical venues. Its 'public' is not confined to those willing and able to walk through its doors. A situated approach to collections use can only take museums so far.<sup>584</sup> These four forms of access – direct interaction, institutional display, loans, and online outreach – all represent major strands of the Armouries' collections engagement strategy. Their distinct contributions to this work are all described by its Collections Access policy.<sup>585</sup> The Armouries clearly recognises the worth of providing a range of complementary routes to engage with its collections. But this does also create certain challenges, as each of these access initiatives embodies a different mode of engagement between individuals and objects – direct, mediated, external, digital. These distinct forms of interaction all make particular demands on the routine practice of collections management in terms of policy, process, and personnel. As such, the remainder of this chapter considers each of these access scenarios in turn, examining the wide range of operational measures implemented by the Armouries to realise its diverse collections programming.

The Armouries' stewardship of the national collection of arms and armour adds an extra layer of complexity to this endeavour. The previous three chapters have shown that the prevailing regulatory assemblage places a range of restrictions on its possession, transfer, and use of weapons in the interests of safety and security. Despite the extra protections that must be enacted to safeguard public engagement, weapons custodians are in no way exempted from the duty to share their objects. Contemporary museums, regardless of their collection type, are expected to make their objects as accessible as possible within their specific operational parameters.<sup>586</sup> The Armouries is no exception, so it has developed comprehensive strategies to accommodate these competing demands. Its registrar staff are instrumental to this endeavour. Given the wide range of functions that registrars are expected to perform (see Figure 1), they are integral to the institutional pursuit of collections access. The nature of these duties – encompassing resource management, logistics, and risk management – means their contribution

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<sup>583</sup> Matassa, *Museum Collections Management*, p. 229.

<sup>584</sup> Keene, p. 177.

<sup>585</sup> Royal Armouries, *Collections Access Policy*, p. 4.

<sup>586</sup> Miller, p. 86.



mainly involves behind-the-scenes facilitation rather than front-line delivery.<sup>587</sup> Public engagement with weapons collections could not effectively function without the backstage work performed by museum registrars. This is certainly true of the Armouries, whose registrar staff are responsible for the complex task of ensuring institutional compliance with the legal and ethical responsibilities of using weapons.<sup>588</sup> They are not greatly helped in this capacity by the existing professional literature. While numerous publications have examined public engagement with museum collections, none appear to have explicitly addressed weapons.<sup>589</sup> The occupational discourse around collections management is a little more promising, but not by much. References to the specific needs of weapons collections have featured in a handful of such texts, but even here the relevant information constitutes a few pages at most.<sup>590</sup> Their brevity means that these works only provide snippets of best practice in weapons management. This thesis therefore seeks to address the prevailing scarcity of published information. In the absence of professional guidance, the Armouries' registrar staff primarily draw on internal resources when managing its weapons collections.<sup>591</sup> In practice, their work is informed by institutional policy and procedure, which translate the demands of the regulatory assemblage to the level of everyday practice. This apparatus frames the processes delivered by the Armouries' registrar staff – documentation, inventory control, storage, security, transport, loans management – that underpin public access to its weapons collections. Even so, this does remain a dialogue. It is the registrar staff and their senior collections colleagues who develop these frameworks at the Armouries in line with the routine demands of using weapons in public museum programming.<sup>592</sup> As access arrangements evolve and diversify to better meet audience expectations, the management structures underpinning them must follow suit. The exercise of individual judgement is essential to this process. Hence, this chapter attentively documents the efforts of the Armouries' registrar staff to reconcile accessibility and safety throughout the process of delivering meaningful public engagement with its weapons collections. Responding to this onerous regulatory assemblage is no easy task.

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<sup>587</sup> Bowes, 'Museum Registrar as "Assembled Role"', p. 70.

<sup>588</sup> Kaines, interview, 8 February 2023, p. 4.

<sup>589</sup> Mason, Robinson, and Coffield, pp. 125-29.

<sup>590</sup> Adams, pp. 114-15; Matassa, *Museum Collections Management*, pp. 14, 22, 139-40; Demeroukas, p. 239.

<sup>591</sup> Bell, interview, 7 February 2023, pp. 2-3.

<sup>592</sup> McKnight, interview, 22 February 2023, pp. 11-12.

## The Fundamentals of Weapons Management

Before examining the Armouries' arrangements for particular forms of collections access, it is important to understand the general principles that underpin weapons management in a museum context. The natural starting point for this exploration of institutional practice is its overarching structure of policy and procedure. After all, a comprehensive and up-to-date apparatus of this type forms a solid foundation for effective collections management.<sup>593</sup> Following the lead of BS 17820, the Armouries has formulated a coordinated group of operational collections policies. Collections access is a key preoccupation of this framework. Alongside the dedicated Collections Access policy introduced in the previous section, its Access, Collections Information, and Collections Care and Conservation policies all contribute to its realisation to some extent.<sup>594</sup> Together, these documents set out the broad directives that govern the provision of access to the Armouries' weapons collections, addressing its legal, professional, and ethical obligations. These policies provide overall direction to its delivery of collections engagement. Beneath this strategic framework sits a larger group of procedures, each one corresponding to an individual collections task and laying out the practical stages of its implementation. They represent the building blocks of weapons management at the Armouries, essential in facilitating public access to its holdings. Formulated in line with the high-level policies, these procedures are designed to ensure the routine actions of its collections staff observe the relevant regulatory structures.<sup>595</sup> As such, they are the bridge between the broad sweep of institutional policy and the everyday practice of collections management. Overall, this two-tier apparatus of policy and procedure is a primary mechanism that the Armouries uses to negotiate the tensions between safety and access inherent to its weapons collections. Between them, these documents encapsulate its institutional approach to weapons management. They necessarily cover a wide range of processes (there are over twenty distinct procedures at last count, see Figure 10), but certain principles transcend the individual documents.<sup>596</sup> Drawing from this institutional framework and interviews with the Armouries' staff, three fundamental strategies underpin all public engagement with

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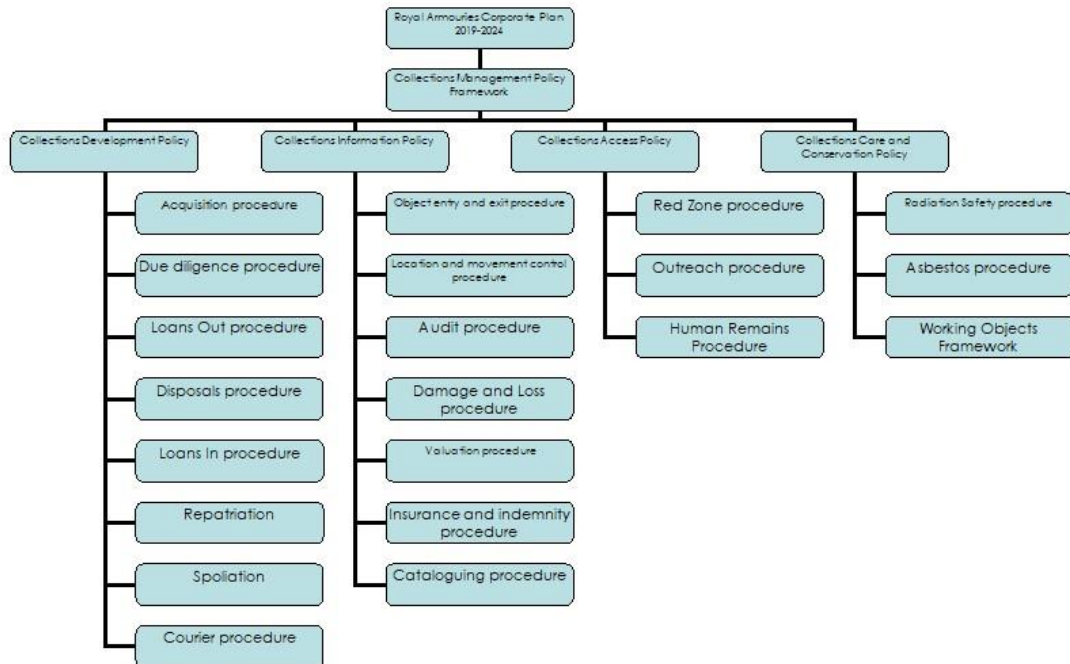
<sup>593</sup> Brad King, 'Understanding Collections', in *Manual of Museum Planning: Sustainable Space, Facilities, and Operations*, ed. by Barry Lord, Gail Dexter Lord, and Lindsay Martin, 3rd edn (Plymouth: AltaMira Press, 2012), pp. 189-211 (p. 196).

<sup>594</sup> Royal Armouries, *Access Policy*, pp. 2-4; Royal Armouries, *Collections Information Policy*, p. 3; Royal Armouries, *Collections Care & Conservation Policy* (Leeds: Royal Armouries, 2019), p. 2.

<sup>595</sup> McKnight, interview, 22 February 2023, pp. 6-7.

<sup>596</sup> Royal Armouries, *Collections Policy Framework*, p. 5.

its holdings – risk management, layered safeguards, and rigorous documentation. These practices are hardly unique to the Armouries, but their exercise acquires special urgency in the context of weapons management.<sup>597</sup> Ultimately, embedding these approaches into its institutional policy apparatus helps the Armouries' registrar staff to facilitate access to its weapons collections in a coordinated, consistent, and safe manner.



**Figure 10: Royal Armouries Collections Policy Framework**

Royal Armouries, *Collections Policy Framework* (Leeds: Royal Armouries, 2019), p. 5.

Risk management is the first of the standard approaches to the use of weapons adopted by the Armouries' registrar staff. Risk is a central concern of museum practice. Contemporary institutions are closely attuned to the potential manifestations and consequences of risk – to their publics, collections, and reputation – throughout their activities.<sup>598</sup> The potential dangers associated with weapons makes the mitigation of risk an even greater imperative for their custodians. Its importance is confirmed by the recurrent mentions of a risk-managed approach to collections use in the Armouries' Collections Access and Collections Care and Conservation policies.<sup>599</sup> In practice, the exercise of risk management follows certain patterns. Firstly, it operates over and above the obligations prescribed by weapons law. There is no prohibition on showcasing a hand grenade that is free from explosive hazards before a public audience, for instance,

<sup>597</sup> Simmons, 'Collection Care and Management', pp. 236-40.

<sup>598</sup> Suse Anderson, "'We Felt Unsafe.'" Rethinking Risk, Harm, and Safety in Museums', *Museums & Social Issues*, 15 (2021), 4-12 (p. 5).

<sup>599</sup> Royal Armouries, *Collections Access Policy*, p. 4; Royal Armouries, *Collections Care & Conservation Policy*, p. 2.

but it is prudent to have extra staff on hand in case of unforeseen issues.<sup>600</sup> Weapons legislation contains a core body of requirements, but beyond this defined remit the Armouries pursues a risk-managed approach to address any situation that the law does not. Risk management is less a process in of itself and more an occupational ethos that is manifested through a range of practices. This is a rational response to the contingent nature of risk when facilitating public access to museum weapons collections. As the WiS case study showed, the level of risk is determined by a wide range of factors: the form of access, the type and quantity of weapons, the group size, the expertise and motives of the participants, the nature of the space, staff familiarity, and so forth. This variability makes the Armouries' registrar team determine their approach to collections access on a case-by-case basis, deploying safeguards to match the risk profile of a given situation.<sup>601</sup> This can be a time-consuming task, but risk management enables them to strike the most appropriate balance between access and safety for all uses of its weapons collections. This is an ongoing process characterised by review and reflection, overseen primarily but not exclusively by the Armouries' registrar staff. They consult both internal colleagues, as occurred during a recent review of its Collections Security procedure, and external partners, such as the MSPA on wider security matters.<sup>602</sup> By harnessing a range of expertise to refine existing approaches, the Armouries seeks to facilitate the various forms of access to its weapons holdings in a more streamlined manner. It may not be possible to entirely eliminate the risks engendered by public engagement with weapons collections, but the resolute pursuit of risk management by the Armouries' registrar staff at least reduces them to a permissible level.

If risk management induces museums to tailor their conduct for individual situations, then it follows that the Armouries has developed measures to regulate the threat posed by its weapons holdings. Its setup consists of multiple layered safeguards, known as the 'onion principle' on account of its overall structure. Its rationale is simple: the greater the number of effective precautions the smaller the chance that the entire system will be compromised.<sup>603</sup> Like the principle of risk management, this approach is by no means unique to the Armouries. The museum sector has long understood the need for multiple levels of protection to safeguard their collections.<sup>604</sup> The increased capacity

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<sup>600</sup> Bell, interview, 7 February 2023, p. 4.

<sup>601</sup> Robson, interview, 7 February 2023, p. 2.

<sup>602</sup> Kaines, interview, 8 February 2023, p. 5.

<sup>603</sup> Home Office, *Firearms Security Handbook*, p. 19; Robson, interview, 7 February 2023, p. 3.

<sup>604</sup> Cato, pp. 401-02.

for harm inherent in weapons renders such measures even more vital. Not only does the Armouries have to consider their heightened security threat, but also the safety of all staff and visitors coming into contact with them. As such, its registrar staff coordinate an array of precautions to reduce the immediate risk: fortified building fabric, reinforced entry points, key access, location control, alarm systems, constant invigilation, remote monitoring, identity verification, confidentiality, and staff training.<sup>605</sup> This list is not exhaustive, but it suffices to convey the Armouries' serious efforts in maintaining the integrity of its weapons holdings. While adherence to the 'onion principle' is consistent across its sites – the White Tower, Fort Nelson, and the Royal Armouries Museum – the constituent elements of their protective apparatus do vary in practice. The needs of a Norman keep, a Victorian fort, and a purpose-built museum differ considerably, so the combination of safeguards is tailored to their distinct situations – for instance, extra internal provisions where the building fabric is less robust.<sup>606</sup> This arrangement is coherent enough to be managed centrally by the Armouries' registrar team, but there is flexibility to account for its assorted venues. This scope for refinement helps the Armouries to meet its access obligations. Its staff are able to tweak individual layers of the 'onion' to maintain an acceptable level of security while impeding public access as little as possible.<sup>607</sup> It is for this reason that the Armouries is able to display its firearms without cables (see Chapter 2), as its other safeguards are perceived to be robust enough to compensate. By conceptualising its security apparatus as an interconnected entity, it can better respond to the needs of its audiences while observing the regulatory assemblage surrounding weapons. In conjunction with a risk-managed approach, the 'onion principle' thus equips the Armouries' registrar staff with the means to strike the delicate balance between visitor access and public safety.

The third key principle that underpins all forms of access to the Armouries' weapons collections is a comprehensive system of documentation. This does take a number of forms in a museum setting, but it is commonly associated with the creation and improvement of object records. Conceived as an ongoing endeavour to record as much accumulated knowledge about cultural collections as possible, this process has long been central to both their management and use.<sup>608</sup> Indeed, the Armouries would

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<sup>605</sup> Robson, interview, 7 February 2023, p. 3; Bell, interview, 7 February 2023, pp. 4-5.

<sup>606</sup> Kaines, interview, 8 February 2023, pp. 7-8.

<sup>607</sup> Bell, interview, 7 February 2023, p. 5; Papadimitriou and others, p. 34.

<sup>608</sup> Stuart A. Holm, *Facts & Artefacts: How to Document a Museum Collection* (Cambridge: Museum Documentation Association, 1991), pp. 2-3.

find it difficult to provide meaningful public access to its weapons holdings if it did not hold an extensive body of descriptive and explanatory information about them. By any measure, this is a major undertaking in its own right. One of the best indications of its institutional significance is that the Armouries employs two personnel within its registrar department dedicated to documentation issues (the Documentation Officer and the Documentation Assistant).<sup>609</sup> They work closely with the Registrar and Assistant Registrars to keep all aspects of collections information up-to-date and accessible. Like the other major principles examined in this section, the documentation requirements for the Armouries' weapons holdings are greater than the average museum object given the additional demands of its regulatory assemblage. In the case of firearms and explosives (but not edged weapons as they are not subject to similar controls), these mainly originate in legislation. As examined in Chapter 1, accurate documentation is a condition of the Museum Firearms Licence and both explosives licences.<sup>610</sup> Generally, these provisions present no additional burden for the Armouries' registrar staff. Much of the object data required by these legal frameworks – their name, type, dimensions, materials, production details, and current location – the Armouries already captures to meet the Spectrum primary procedures.<sup>611</sup> Comprehensive documentation of all collections, weapons or otherwise, is thus embedded in its institutional working practices as a museum. The Armouries' registrar staff do audit the records for higher risk objects more regularly in light of the licensing arrangements, but its standard documentation procedure suffices for weapons by and large.<sup>612</sup> Accuracy is as important as breadth. The staple information generated through this work is valuable to groups approaching the Armouries' weapons collections with quite different intentions, whether staff, general visitors, or regulatory authorities. Object documentation is therefore unusual in being one of the few processes that helps the Armouries to simultaneously fulfil its competing commitments to public safety and enhanced collections access. Its current activities are founded on this tireless labour.

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<sup>609</sup> Lambert, interview, 23 February 2023, pp. 1-2.

<sup>610</sup> Home Office, *Firearms Licensing Law*, p. 144; *The Explosives Regulations 2014*, pp. 36-38.

<sup>611</sup> Museum Accreditation, *Accreditation Guidance*, p. 53.

<sup>612</sup> Kaines, interview, 29 November 2021, p. 10.

**Firearms & Artillery**

FLC: Section 5

Calibre: 1 7.62 mm, 2 0.3 in

Artillery Calibre:

Serial Number: 1 26180 not original

SLA Use?:  Yes  No

**Ammunition**

Cartridge Type: 7.62 x 39 mm Rimless M1943, Russian

FFE Number: N/A

**Proofing**

In Proof?:  Yes  No

Proof Date: 1 12/03/1967

**Rifling Characteristics**

Rifling Nature:

Twist Rate:

**Shooting**

Date	Location	Reason	No. of Rounds	Note
*				

**Figure 11: Firearms and Artillery Tab, EMU**

Screenshotted by the author, 24 February 2023.

Furthermore, there are forms of information specific to certain weapons that the Armouries is required to record over and above the minimum professional standard. Its approach is best illustrated by EMU, the Armouries' collections management database, which contains a dedicated 'Firearms and Artillery' tab that it commissioned to meet the conditions of its Museum Firearms Licence (Figure 11).<sup>613</sup> This enables its personnel to record the required information for these objects that is not relevant to other collection types. Given the importance of this task, the Armouries' documentation staff have highlighted the mandatory fields in red to distinguish them.<sup>614</sup> As shown by Figure 11, these include their 'Calibre', 'Cartridge Type', and 'Serial Number' to identify individual firearms, as well as the crucial 'FLC' (Firearms Licensing Certification) field that describes an object's legal status and thereby governs its public accessibility. Not only does this page enable the documentation of the physical and legal characteristics of firearms, but also their projected use. The 'SLA Use?' checkbox records those firearms solely used by government agencies for training, identification, and forensic purposes under the Service Level Agreements that the Armouries fulfils as the operator of the National Firearms Centre.<sup>615</sup> The general public are not the only stakeholders that require access to its collections. The Armouries also uses the 'Firearms and Artillery' tab to comply with the relevant explosives regulations. The 'Cartridge Type' field

<sup>613</sup> Lambert, interview, 23 February 2023, pp. 5-6.

<sup>614</sup> Royal Armouries, 'Cataloguing Procedure' (unpublished internal document, 2022), p. 3.

<sup>615</sup> Bell, interview, 29 November 2021, p. 5.

records the nomenclature of small arms ammunition (again, see Figure 11), while the ‘FFEH Number’ enables it to declare the unique designation indicating that an object has been declared free from explosives by an official authority. A large amount of data integral to weapons management at the Armouries can thus be captured through this single page. Yet, the heightened safety risk posed by the presence of explosives means that further information is needed from a collections care perspective. Any object that might contain explosive material is also identified under a separate ‘Hazards’ tab, which generates a visual alert for anyone viewing the record (see Figure 12, the warning symbol enclosed by the red square). Clear identification is the first step in averting the damaging results of a potential explosion.<sup>616</sup> In conjunction, the type and quantity of explosives can also be recorded on this page, which helps the Armouries to remain within the limits set by its licenses. In the case of both firearms and explosives then, their legislative requirements add a sizable volume of information to the already high standards of museum documentation. Given the scale of this undertaking, it is not something that the Armouries’ registrar staff can address alone. While they are mainly responsible for inputting and updating the relevant data, their curatorial colleagues often supply the necessary specialist knowledge – they determine the appropriate FLC, for example.<sup>617</sup> The Armouries’ documentation system thus harnesses the collaborative efforts of its wider collections department to develop a comprehensive record of its weapons holdings. Without this close partnership, it would be difficult to collate the copious information required to facilitate access to its weapons in a responsible manner.

84986  
XX.5701, Centrefire shotgun cartridge, Taser XREP

Hazards

Date Checked: 06/07/2021

Hazard Type: Explosive Material (Confirmed)

Hazard Note:

**Figure 12: Hazards Tab, EMu**

Screenshotted by the author, 7 March 2023.

<sup>616</sup> Dadson, pp. 63-64.

<sup>617</sup> Lambert, interview, 23 February 2023, p. 7.



Individual object entries are a cornerstone of effective weapons management, but they are not the only form of documentation that underpins access to the Armouries' holdings. Many types of record are produced in the course of museum operations, which can be overshadowed by the capture of collections data.<sup>618</sup> An effective documentation strategy encompasses a much greater remit. As codified expressions of institutional practice, the Armouries' procedures constitute key components of this expanded documentation apparatus.<sup>619</sup> While these instruments outline the form that its measures *should* take based on regulatory demands and institutional aims, they also incorporate the measures that its personnel *do* take in response to the demands of everyday practice. The documentation of collections management process is thereby central to the work of the Armouries' registrar staff, as a source of accountability for their actions.<sup>620</sup> The heightened risks and sensitivities involved in facilitating access to museum weapons collections further encourage the creation of a paper trail as soon as any new initiative is proposed. It is thus standard practice for the Armouries' registrar staff to record the decision-making process at every stage of preparing access to its weapons holdings, saving the relevant documentation and correspondence for future reference.<sup>621</sup> This diligence is not unique to the use of its weapons collections, but it is especially important when they are involved. Should the Armouries ever need to prove its regulatory compliance, it is useful to have a full account of its operational conduct on hand. The evidence required does vary according to the mode of access, but the safety and security needs of weapons ordinarily warrant rigorous documentation of the entire process. Risk assessments, licences, and correspondence with enforcing authorities all contribute to the wider documentary infrastructure associated with the Armouries' weapons collections.<sup>622</sup> The added demands of weapons stewardship thus generate even more paperwork. Given their universal application across the Armouries' activities, these structures often intersect with the other key principles of risk management and layered security. Every stage of determining and mitigating risk for an event involves documentation in some form: its Collections Security procedure provides the overall framework, locations and staff ratios are documented in individual risk assessments,

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<sup>618</sup> Charlotte Brunskill and Sarah R. Demb, *Records Management for Museums and Galleries: An Introduction* (Oxford: Chandos, 2012), pp. 26-27.

<sup>619</sup> Royal Armouries, *Collections Policy Framework*, p. 5.

<sup>620</sup> Kaines, interview, 8 February 2023, pp. 9-10.

<sup>621</sup> McKnight, interview, 22 February 2023, p. 13.

<sup>622</sup> Rex, pp. 187-88; Bell, interview, 7 February 2023, p. 10.

object movement is recorded on its collections management system, and each visitor completes an identification form (see Figure 9).<sup>623</sup> This step-by-step account of the Armouries' access arrangements provides the opportunity to review the safeguards at each stage of the process. Better to approach this sensitive task with greater caution than to miss any potential oversight. It is not enough for the Armouries' registrar staff to mitigate the risks of facilitating access to weapons collections, they must also be able to demonstrate the integrity of their methods beyond all doubt.

It is clear then that risk management, layered safeguards, and comprehensive documentation each play a vital role in the provision of access to the Armouries' weapons collections. All three approaches ultimately contribute to the identification and mitigation of risk, the primary objective of weapons regulation.<sup>624</sup> Risk management confirms the operational threat capacity, the 'onion principle' determines a proportional suite of safeguards, and detailed records substantiate these decisions. As components of the Armouries' overall effort to balance the claims of safety and access, these principles routinely overlap in practice. Just as legal controls and professional standards intersect to form the existing regulatory assemblage, these strands of its weapons management strategy likewise reinforce one another. This has enabled the Armouries' registrar staff and their colleagues to produce a holistic collections management apparatus that accommodates its unique situation as the national museum of arms and armour.<sup>625</sup> These approaches can be applied across its collections, weapons or otherwise, without prejudice to the needs of either. The general value of risk management, layered security, and thorough documentation to collections access is certainly attested in the published literature.<sup>626</sup> But the additional controls on the stewardship of weapons collections oblige the Armouries' registrar staff to go beyond standard practice in each of these areas. This can respectively entail an increased propensity to seek a second opinion, the strengthening of individual precautions, or the entry of extra object data. These further measures are embedded in institutional policy and procedure to ensure their consistent application across the Armouries' operations.<sup>627</sup> Even so, this coordinated approach to weapons access does not preclude the ability to adapt to circumstance. While certain

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<sup>623</sup> Robson, interview, 7 February 2023, pp. 1-2.

<sup>624</sup> Hill, p. v.

<sup>625</sup> Ambrose and Paine, pp. 234-35.

<sup>626</sup> Matassa, *Museum Collections Management*, p. viii; Simmons, 'Collection Care and Management', pp. 236-40; Miller, pp. 79-83.

<sup>627</sup> McKnight, interview, 22 February 2023, pp. 6-7.

measures designed to meet the Armouries' legal and professional obligations cannot be negotiated, these overarching approaches do encourage the case-by-case assessment of each prospective use of its weapons collections. Together, they constitute a responsive framework to determine the appropriate balance of access, safety, and security in any given instance. This tailored approach is more labour intensive for the Armouries' registrar staff, but it is seen as the most effective way of accommodating the complex array of actors involved.<sup>628</sup> This capacity for flexibility in their exercise of weapons management is particularly important given the various forms of collections access they support. Whatever the peculiarities of direct access, mediated access, external access, and digital access, the use of the Armouries' weapons collections invariably entails risk mitigation, layered security, and sustained documentation in some capacity. Yet, the particular needs of different access arrangements can cause these fundamentals of weapons management to be enacted in quite distinctive ways during routine practice.

### **Direct Access: Working and Handling**

One of the more immediate manifestations of collections access supported by the work of the Armouries' registrar staff is direct interaction with institutional objects. It is expected that museums will enable their audiences to connect with the 'real thing', the physical fragments of cultural heritage contained in their collections.<sup>629</sup> If this general obligation were not enough reason to facilitate unmediated collections access, it has also been given professional force. MAS, for example, explicitly requires accredited institutions to maintain and improve physical access to their collections.<sup>630</sup> In response to these expectations, museums have developed a range of opportunities for direct access to their objects: collections research, handling sessions, demonstrations, store tours, and open storage.<sup>631</sup> While the rationale behind these strategies varies, they are all characterised by the absence of fixed material barriers between an object and those engaging with it. From the perspective of collections access, where the prevailing paradigm seeks the removal of impediments, unmediated interaction with collections is a highly desirable outcome.<sup>632</sup> However, numerous challenges must be overcome before

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<sup>628</sup> Robson, interview, 7 February 2023, p. 8.

<sup>629</sup> Black, pp. 9-10.

<sup>630</sup> Museum Accreditation, *Accreditation Standard*, p. 9.

<sup>631</sup> King, pp. 194-95.

<sup>632</sup> Matassa, *Museum Collections Management*, p. 230.

the benefits of direct engagement can be fully realised. Museums cannot suspend their duties to guarantee public safety or to maintain the integrity of their collections (see Chapter 3), so the protection offered by physical safeguards has to be reintroduced elsewhere. This task becomes harder when weapons enter into the equation. Certain commentators have highlighted the heightened safety and security concerns raised by the handling of weapons specifically.<sup>633</sup> The regulatory assemblage governing the use of museum weapons collections cannot be ignored either. In seeking to facilitate direct collections access then, the Armouries must be particularly careful to square its institutional responsibilities. This tension is clearly evident in its Collections Access policy. It outlines study, handling, and demonstrations as routine forms of direct access to its collections, but with the important proviso that these outputs are subject to both legislative and safety requirements.<sup>634</sup> Once again, striking the appropriate balance between access, safety, and security is paramount. The Armouries' registrar staff oversee many of the processes that make this delicate arrangement work in practice. Following the principle of risk management, they coordinate a range of measures across their remit to mitigate the immediate and holistic threats of providing personal access to its weapons collections. No detail can be overlooked in fulfilling the legal and ethical obligations of the national museum of arms and armour. The level of direct access ultimately possible at the Armouries may not be as extensive as other museums given the nature of its collections, but it is certainly not through lack of determination.

Given its overall importance, the Armouries' provisions for direct access are embedded at the highest operational levels. This is because the entire apparatus has to satisfy the regulatory assemblage surrounding its weapons collections, especially the expectations of its licensing authorities. The Armouries thus implements a base level of safeguards across its venues to protect both people and objects at all times. These measures include robust building specifications, successive checkpoints, dispersed storage, constant surveillance, qualified personnel, and key control.<sup>635</sup> As coordinators of this system, the Armouries' registrar staff have to determine how collections access can be accommodated within this formidable structure. Following the principle of risk management, they operate a graduated approach to the Armouries' spaces and the collections contained therein. The first major variable governing collections access is its

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<sup>633</sup> Adams, p. 117; Miller, p. 83.

<sup>634</sup> Royal Armouries, *Collections Access Policy*, pp. 3-4.

<sup>635</sup> Bell, interview, 7 February 2023, pp. 4-5; Robson, interview, 7 February 2023, p. 2.

location. The Armouries' registrar staff have performed risk assessments for all spaces across its sites based on the hazards and legislative controls of the objects contained therein, which have been compiled in its Collections Security procedure.<sup>636</sup> Under these criteria, weapons storage is generally deemed as higher-risk and thereby requires greater controls. All stores containing live ammunition or explosives are rated at the highest risk level, for example, given their material volatility.<sup>637</sup> The second key factor is the person or people seeking access to the collection. Where this occurs behind closed doors, entry to controlled museum spaces requires serious thought. Corresponding to their need and experience, all individuals are assigned one of four levels of clearance that determines their access to the Armouries' collections – from those requiring close invigilation (most visitors and untrained staff) to fully authorised personnel.<sup>638</sup> Although weapons are not referenced explicitly here, the underlying premise is that direct access to them should always involve trained staff, as participants or supervisors. The resulting crossover of space and individual determines the level of safeguards for every instance of immediate collections access. For each permutation, the Armouries' registrar staff have worked out appropriate invigilation ratios, sign-in procedures, and handling conditions, whose strength scales proportionally with the potential risk.<sup>639</sup> These form core adjustable components of the 'onion principle' that calibrate the delicate balance between safety and access. The intricacy of this system demonstrates the serious consideration that the Armouries' registrar staff devote to collections access. As long as the requisite safeguards are in place, very few of its weapons holdings are entirely off limits to general visitors (save people forbidden by law from possessing them under any circumstances).<sup>640</sup> The Armouries could enforce a greater level of physical security to the detriment of its public role, citing the demands of weapons regulation, but instead it works to maximise collections access within its operational parameters. Even the heightened safety needs of weapons collections can be reconciled with the claims of direct access given enough preparation.

Within this overarching framework for direct collections access, the Armouries has developed a series of measures to regulate the handling of its weapons collections. The act of bringing objects and participants together forms the initial stage of this

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<sup>636</sup> Royal Armouries, *Collections Access Policy*, p. 3.

<sup>637</sup> Lambert, interview, 23 February 2023, pp. 7-8.

<sup>638</sup> Royal Armouries, 'Collections Security Procedure', p. 4.

<sup>639</sup> Royal Armouries, 'Collections Security Procedure', pp. 3-5.

<sup>640</sup> Kaines, interview, 8 February 2023, p. 4.

process, as collections stores and public areas are often intentionally separated from one another.<sup>641</sup> Bridging this distance is not as straightforward as might be expected. Only qualified Armouries staff are authorised to transport objects between these spaces, as they have been trained to perform this task safely and securely in line with current professional standards.<sup>642</sup> The need for suitable instruction is a common theme of collections access, regardless of the participant or proposed use. It is institutional policy that all visitors who directly engage with its objects are briefed about safe handling conduct beforehand.<sup>643</sup> The handling guidance for the Armouries' weapons holdings is necessarily more substantial than standard practice. No weapon should ever be pointed at another person, firearms should always be treated as loaded, firearms should not be cocked or dry fired, unprotected handling of sharp weapons should be minimised, live explosives should be disturbed as little as possible, and so on.<sup>644</sup> These precautions are equally as important for the safety of those accessing the collections as for the integrity of the objects being accessed. A serious accident could easily happen if this cautious approach was not maintained. The observation of these handling standards relies upon effective invigilation on the ground. Manageable staff to visitor ratios are one aspect of this strategy, but it also depends on individual competence. The Armouries' personnel can only supervise store visits once they have passed a disclosure check and completed collections security training that must be refreshed every three years.<sup>645</sup> Having experts on hand to monitor proceedings – and intervene if necessary – minimises the risk to individuals, the objects, and the institution alike. This system requires interdepartmental cooperation to function. While it is coordinated overall by the Armouries' registrar department, the handling sessions themselves are usually conducted by its curatorial and interpretation staff. Regardless of an invigilator's position, institutional wisdom posits that any form of access involving direct interaction with weapons necessitates added awareness and caution on their part.<sup>646</sup> Given the potential dangers always involved in handling weapons, there is no substitute for the presence of trained individuals who are comfortable working with these challenging objects. The integration of robust

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<sup>641</sup> Mirjam Brusius and Kavita Singh, 'Introduction', in *Museum Storage and Meaning: Tales from the Crypt*, ed. by Mirjam Brusius and Kavita Singh (London: Routledge, 2017), pp. 1-34 (p. 4).

<sup>642</sup> Dixie Neilson, 'Object Handling', in *MRM6: Museum Registration Methods*, ed. by John E. Simmons and Toni M. Kiser, 6th edn (Lanham: Rowman & Littlefield, 2020), pp. 220-37 (p. 220).

<sup>643</sup> Royal Armouries, 'Visitor Access Guidelines for Collection Areas' (unpublished internal document, 2022), p. 2.

<sup>644</sup> Adams, pp. 114-15; Lambert, interview, 23 February 2023, p. 8.

<sup>645</sup> Royal Armouries, 'Collections Security Procedure', pp. 6-7.

<sup>646</sup> McKnight, interview, 22 February 2023, pp. 5-6.

procedure and competent supervision thus forges a strong baseline of personal safety at the heart of the Armouries' provision of direct collections access.

Moreover, in another demonstration of the Armouries' risk-managed approach, its general handling guidelines are supplemented by further measures tied to the status of the weapons in question. For routine engagement sessions on the gallery floor, the desire to keep access barriers to a minimum prompts the pursuit of stronger safeguards elsewhere. The Armouries maintains a separate handling collection for this specific purpose, a common strategy in museums to enable tactile engagement with a selection of more robust and manageable items.<sup>647</sup> But unlike other object types, the weapons belonging to its distinct 'M Class' holdings have to pass additional checks before they can be used in public programming. All weapons in this category are closely inspected to make sure anyone can handle them safely, and they can even be modified to remove all threats as they are not accessioned objects.<sup>648</sup> In this exceptional case, it is possible to neutralise the physical risk posed by weapons at its source, allowing them to be used to support object-based learning and interaction free of restrictive safeguards. Direct access to the Armouries' study collections is more heavily regulated by contrast, as its commitment to maintaining their original condition as far as possible precludes their modification or deactivation.<sup>649</sup> Given that these weapons can still readily inflict harm (unlike their 'M Class' counterparts), access to them and their storage locations is subject to extra safeguards. Invigilator permission is a precondition of handling these objects, untrained individuals have to record their presence in controlled collections areas, prohibited persons are excluded completely, and the Armouries' staff ultimately reserve the right to deny access to anyone for inappropriate behaviour.<sup>650</sup> Collections access is a core duty of museums, but it must be tempered for the sake of general welfare when weapons are involved. The documentation of individual instances of access underpins this entire system. The Armouries' use of collections access forms to confirm personal identity was raised during the WiS case study, but this process is not always rigid. Visitors are generally obliged to show identification before accessing its study collection under weapons law, but exceptional circumstances are acknowledged. If an individual seeking access to the Armouries' collections cannot prove their identity,

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<sup>647</sup> Ambrose and Paine, p. 237.

<sup>648</sup> Bell, interview, 7 February 2023, p. 3.

<sup>649</sup> Royal Armouries, *Collections Care & Conservation Policy*, pp. 2-3.

<sup>650</sup> Royal Armouries, 'Visitor Access Guidelines', pp. 2-3.

there is a fallback whereby its Registrar can seek one-off approval from its executive staff which is then recorded for audit purposes.<sup>651</sup> This a prime example of the ‘onion principle’ in action. The safeguards might be altered to accommodate everyday realities, but they still maintain a high level of professional integrity overall. The operational assemblage overseen by the Armouries’ registrar staff can thus be routinely adapted to better support the various forms of direct access within manageable risk parameters.

Handling opportunities are not the only form of direct collections access pursued by the Armouries. Museums have long grasped the value of demonstrating their objects in action as a means of ‘bringing them alive’.<sup>652</sup> A highly visible use of the Armouries’ weapons holdings for collections access is its public demonstration of various firearms, edged weapons, and artillery. However, the repeated operation of museum objects exerts a steady physical toll. As with its handling sessions, the weapons used for this dramatic spectacle are thus drawn from its risk-assessed ‘M Class’ collection.<sup>653</sup> This is done for the same reasons of ensuring participant safety and protecting the study collection from the stresses of overuse. Interestingly, the Armouries’ demonstration of its weapons circumvents certain challenges raised by other forms of direct access. It is only carried out by qualified staff, so the general public do not actually possess the weapons at any point. This negates the demands of regulatory assemblage to vet and instruct untrained individuals before any physical encounter with these collections. Of course, the initial preparation of the Armouries’ demonstrators has to be highly rigorous given their routine use of these potentially harmful objects. They receive thorough instruction from internal experts, they are only certified on specific weapons, and the whole process is recorded to document their proficiency.<sup>654</sup> The use of black powder for firearms and artillery displays imposes further demands. Aside from the Armouries’ demonstrators being individually cleared by the police to acquire explosives, extensive training and regular inspection by licensing authorities are required to possess the necessary quantities of black powder used during live firings.<sup>655</sup> Once again, immediate forms of engagement rely on extensive unseen preparations conducted by a network of

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<sup>651</sup> Royal Armouries, 'Collections Security Procedure', p. 6.

<sup>652</sup> Petra Tjitske Kalshoven, 'Beyond the Glass Case: Museums as Playgrounds for Replication', in *The International Handbooks of Museum Studies*, ed. by Helen Rees Leahy and Sharon Macdonald, 4 vols (Chichester: John Wiley & Sons, 2015), III: *Museum Media*, ed. by Michelle Henning, pp. 553-76 (pp. 564-65); International Council of Museums, *ICOM Code of Ethics*, p. 10.

<sup>653</sup> Royal Armouries, 'Working Objects Framework' (unpublished internal document, 2022), p. 2.

<sup>654</sup> Kaines, interview, 8 February 2023, pp. 10-11.

<sup>655</sup> Kaines, interview, 29 November 2021, pp. 12-13.



staff. But public demonstration is not the only form of collections access that involves active use of the Armouries' weapons holdings. Its Service Level Agreements with government agencies contain provisions for their personnel to access its firearms collections for training programmes at the NFC.<sup>656</sup> As part of this work, they are authorised to fire many of these objects under certain conditions. Many of the safeguards remain the same – licensed and certified personnel, specific class designations, risk assessment of individual objects – but the use of accessioned firearms carries additional duties, such as the need to record every firing in its collections management database (see Figure 11).<sup>657</sup> The rationale behind this usage of the Armouries' weapons collections might be quite different to public demonstrations, but both are ultimately subject to thorough risk mitigation strategies. The active operation of weapons precipitates the greatest level of immediate danger, so it follows that the Armouries' registrar staff spare no effort in neutralising all potential threats.

The provision of direct access to museum weapons collections is invariably a serious undertaking. The substantial safety and security risks of physical interaction require careful planning by the Armouries' registrar staff to develop the appropriate safeguards. Their commitment to the use of its weapons collections 'within legal, ethical and safe operating bounds' is apparent from operational policy right down to practical implementation.<sup>658</sup> The core of this institutional apparatus is the interrelated group of procedures governing direct object encounters, namely its Collections Security procedure, Visitor Access Guidance, and Working Object Framework. Together, these documents detail the practical strategies for managing all interactions with its weapons within the prevailing regulatory parameters. Designed for general application across the Armouries' activities, they accommodate different forms of direct collections access while maintaining robust standards of collections integrity.<sup>659</sup> This system is flexible enough to reconcile the competing claims of physical interaction and personal safety surrounding its weapons collections. Where barriers are withdrawn to encourage visitor access, the Armouries' registrar staff follow best practice by fortifying precautions in other areas.<sup>660</sup> The thorough assessment of weapons in its 'M Class' handling collection before their use on the gallery floor is a prime example of this responsive approach.

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<sup>656</sup> McKnight, interview, 22 February 2023, p. 11.

<sup>657</sup> Lambert, interview, 23 February 2023, p. 5; Royal Armouries, 'Working Objects Framework', p. 3.

<sup>658</sup> Royal Armouries, *Collections Access Policy*, p. 4.

<sup>659</sup> Simmons, 'Collections Management Policies', p. 34.

<sup>660</sup> Matassa, *Museum Collections Management*, pp. 233-34.

Making these delicate adjustments to the access arrangements for weapons holdings relies on sustained interdepartmental collaboration. The Armouries' registrar staff rarely deliver collections access in person, as this work is usually performed by its curators or demonstrators, but their overall coordination of this system is crucial. This combination of complementary staff expertise and a detailed procedural framework provides the appropriate capacity to simultaneously fulfil the primary operational duties of safety, security, and access. It is also important to acknowledge that the Armouries has to consider parties other than its visitors when determining direct engagement with its weapons collections.<sup>661</sup> Its staff need to access them in the course of their everyday duties, and as the national museum of arms and armour, it places its collections at the disposal of law enforcement agencies in the interests of national security. The reasons for access may be different, but the same regulations and responsibilities remain. The Armouries' registrar staff are ultimately responsible for assessing any concerns around collections access and devising proper safeguards, whatever its form or purpose.<sup>662</sup> Given the challenging nature of weapons, there are many potential risks to their physical use in museum programming – personal injury, security breach, object loss, legal infringement, reputational damage. The serious ramifications of any immediate incident thus demand equally serious preparations by the Armouries' registrar staff.

### **Mediated Access: Display and Exhibition**

If direct access to museum collections is an ideal for which all institutions strive, then mediated access to them through exhibitions and displays remains a standard means of engagement. They have even been described as 'the defining communicative medium of the museum'.<sup>663</sup> This is not to say that the curated exhibition of collections is a static field. Developments across a range of areas – collections diversification, digital media, live interpretation, interactive environments, co-curation and co-creation – are in the process of transforming public display.<sup>664</sup> But it is ultimately difficult to imagine the

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<sup>661</sup> Lambert, interview, 23 February 2023, p. 12.

<sup>662</sup> Robson, interview, 7 February 2023, p. 1.

<sup>663</sup> Linda Young, Anne Whitelaw, and Beier-de Haan, 'Museum Exhibition Practice: Recent Developments in Europe, Canada, and Australia', in *The International Handbooks of Museum Studies*, ed. by Helen Rees Leahy and Sharon Macdonald, 4 vols (Chichester: John Wiley & Sons, 2015), II: *Museum Practice*, ed. by Conal McCarthy, pp. 403-29 (p. 403).

<sup>664</sup> Dan Spock, 'Museum Exhibition Tradecraft: Not an Art, but an Art to It', in *The International Handbooks of Museum Studies*, ed. by Helen Rees Leahy and Sharon Macdonald, 4 vols (Chichester: John Wiley & Sons, 2015), II: *Museum Practice*, ed. by Conal McCarthy, pp. 379-402 (pp. 382-83).

museum as an institution without physical galleries of some description. The Armouries certainly shows no sign of closing the numerous exhibition spaces across its three sites. It has a clear legal duty to maintain these display arrangements, as the *National Heritage Act 1983* explicitly charges the Armouries with exhibiting its objects to the public.<sup>665</sup> This obligation applies equally to its weapons holdings as to any other part of its institutional collections. But again, the additional regulations surrounding their use complicate the process in comparison to other museum objects. The exhibition of weapons collections is particularly sensitive from an ethical standpoint, which informs both their management and interpretation.<sup>666</sup> In order to negotiate the evident difficulties, the development of effective public displays containing these controversial objects requires a concerted effort across the Armouries. Curators may be most visibly associated with museum exhibitions as their intellectual driving force, but it is also important to recognise the contribution of registrars in coordinating the collections management processes that underpin them.<sup>667</sup> Exhibition management and installation are both commonly identified as key elements of registrar practice (see Figure 1). The Armouries' registrar staff are thus regularly preoccupied with the routine practicalities of exhibiting its weapons collections. From a regulatory perspective, facilitating mediated access to weapons through public displays is generally easier than providing direct access to them. The presence of display cases as physical barriers, for example, effectively removes both the possibility of physical possession and the potential for personal harm while objects are exhibited. Even with this increased material protection, however, the constant presence of weapons in the Armouries' public areas raises a different set of challenges. Criminal interest in weapons is a perennial threat, but one that is especially acute on the gallery floor.<sup>668</sup> Its registrar staff thus coordinate another robust system of security measures to deter any unlawful intent. Exhibitions may appear to provide a comparatively low-risk form of collections access, but the Armouries can never afford to be complacent in the use of its weapons holdings.

The regulatory assemblage surrounding weapons collections imposes substantial demands on any museum seeking to facilitate access through public display. While the Armouries is obliged to meet general security standards under firearms and explosives

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<sup>665</sup> *National Heritage Act 1983*, p. 11.

<sup>666</sup> Bowes, 'Museums, Conflict, and Forgetting', pp. 50-51.

<sup>667</sup> Adrian George, *The Curator's Handbook* (London: Thames & Hudson, 2015), pp. 193-95.

<sup>668</sup> McKnight, interview, 22 February 2023, p. 9.

law, its registrar staff derive the practical detail of their display requirements from the security conditions of GIS and discussions with the MSPA (see Chapter 2).<sup>669</sup> These authorities provide a benchmark for the secure exhibition of material heritage. The Armouries employs some of the recommended safeguards consistently throughout its venues, such as comprehensive CCTV and a constant on-site security presence.<sup>670</sup> Certain layers of the ‘onion principle’ thus contribute to secure access across the Armouries’ activities. Others, however, are designed to mitigate the particular risks associated with the public exhibition of weapons. Continual staff presence in the Armouries’ galleries not only provides support for visitors, but also satisfies the need for constant invigilation of displayed objects.<sup>671</sup> The interests of access and security do not always clash. Some parts of the Armouries’ display arrangements even consciously exceed the prevailing guidance on account of the heightened risks posed by its weapons collections. Its display cases certainly belong to this category, as the first line of defence on the gallery floor. All weapons, aside from the most immovable pieces, are displayed behind glass to maintain the security of the objects and the safety of their viewers.<sup>672</sup> Given the severe consequences if it were to be compromised, this protective barrier has to be seriously durable. The Armouries thus utilises display cases that meet the wide range of detailed specifications recommended by the Firearms Security Handbook: overall location, stability, and alarms; the material, technique, and size of construction; the positioning and dimensions of doors; the type, thickness, and mounting of panels; and the accessibility and resistance of locks.<sup>673</sup> The high proportion of weapons exhibited by the Armouries compels its registrar staff to observe a more rigorous framework than any equivalent museum standard. In fact, they use these enhanced case specifications for all of its collections to maintain institutional uniformity.<sup>674</sup> If museum objects are to be displayed in cases, it follows that they should be as secure as regular institutional capacity allows. The Armouries’ approach to the public exhibition of its weapons collections has so far been characterised by consistency, but there are certain scenarios that warrant a stronger response. In gallery spaces where high-risk Section 5 firearms are concentrated, for example, extra CCTV has been installed and obstructions

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<sup>669</sup> Royal Armouries, *Collections Care & Conservation Policy*, p. 4.

<sup>670</sup> Robson, interview, 7 February 2023, p. 9.

<sup>671</sup> Arts Council England, *Government Indemnity Scheme: Guidelines*, p. 79; McKnight, interview, 22 February 2023, p. 10.

<sup>672</sup> Kaines, interview, 8 February 2023, pp. 12-13.

<sup>673</sup> Home Office, *Firearms Security Handbook*, pp. 22, 32-33.

<sup>674</sup> Robson, interview, 7 February 2023, p. 9.

have been removed to improve surveillance.<sup>675</sup> Its registrar staff are always sensitive to the claims of risk management. The exhibition of weapons collections may be more predictable overall than the provision of direct access, but determining the appropriate combination of safeguards requires just as much thought and preparation.

If the display conditions for weapons collections are generally stable once they are on show, then their installation and deinstallation represent moments of greater risk. The safe accomplishment of these processes relies upon the close cooperation of various museum personnel – curators, technicians, conservators, and, of course, registrars.<sup>676</sup> Again, the contribution of the Armouries' registrar staff to this undertaking leans more towards coordination than delivery. When weapons are being transported between storage and display spaces, it is essential that the relevant regulatory obligations are observed at all times. In the interests of safety and security, it is standard institutional policy to close off a gallery, a floor, or even a whole site depending on the scale of a redisplay.<sup>677</sup> Appropriately isolating the exhibition space removes outside intervention from the equation at a moment of heightened vulnerability and reduced physical protection. This is crucial for weapons collections, whose increased risk to both staff and external parties requires additional care to be taken during display preparations.<sup>678</sup> For the same reason, the practical features of the Armouries' installation process are also closely regulated. Only certain named staff are authorised to access the confined space and the timing of object moves is controlled – for example, Section 5 prohibited firearms can only be transported through public areas outside of visitor hours.<sup>679</sup> Not only do these measures protect the individuals and objects involved in its exhibitions, but they also help the Armouries to observe the stipulations of weapons law. As current legislation forbids the physical possession of firearms and explosives by certain groups, the restriction of object installation to a few qualified staff precludes any unauthorised interference. Moreover, their extensive knowledge of the collection and its potential dangers causes them to approach the delicate task of relocating weapons with sufficient caution.<sup>680</sup> Unpredictable variables must be kept to a minimum. This close supervision over the entire installation process is underwritten by diligent documentation, where the

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<sup>675</sup> Bell, interview, 7 February 2023, p. 9.

<sup>676</sup> George, p. 86.

<sup>677</sup> Bell, interview, 7 February 2023, pp. 9-10.

<sup>678</sup> Matassa, *Organizing Exhibitions*, p. 119.

<sup>679</sup> Royal Armouries, 'Collections Security Procedure', p. 3; Robson, interview, 7 February 2023, p. 10.

<sup>680</sup> McKnight, interview, 22 February 2023, pp. 5-6.

inclusion of weapons again overlays professional practice with legal force. The Armouries' registrar staff promptly update its object records after all exhibition moves, which they further supplement with rolling collections audits across its gallery and storage spaces so that all weapons transit can be reported to its licensing authorities.<sup>681</sup> The maintenance of national security requires them to closely monitor the nature and quantity of licensable weapons on public display. As the most exposed stages during the exhibition process, the installation and deinstallation of weapons collections in museum galleries thus warrant an enhanced body of protections. If the Armouries could not achieve this in a safe and legal manner, a large proportion of its collections would essentially remain inaccessible to its audiences.

It is not only the changeover of exhibitions that presents a greater challenge, as the same risks apply whenever a display case containing weapons is opened. Museums need to access their cases outside of the installation period for a variety of reasons: object removal (temporary or permanent), text replacement, display alteration, security enhancement, inspection, cleaning, maintenance, or emergency salvage.<sup>682</sup> Whatever the cause, the Armouries' registrar team have to anticipate any suspension of the physical protection offered by a case. Their main pre-emptive action to mitigate this potential threat is to discourage all staff access to its displays within public opening hours. Not only does this limit the exposure of their security mechanisms, but it also reduces the likelihood of personal harm if anything were to go wrong – a principle reinforced by the requirement for at least two staff to be present at all case openings.<sup>683</sup> This prioritisation of out-of-hours entry thus substitutes as an equivalent safeguard to compensate for the temporary lack of a physical barrier. One security layer replaces another, upholding the substance of the 'onion principle'. Access to certain high-risk categories of displayed weapons is curtailed even further by the prevailing regulatory assemblage. While it is institutional procedure that any gallery case 'should not' be opened during public hours without the Registrar's express permission, any display containing Section 5 prohibited firearms 'must not' be accessed during these times.<sup>684</sup> A risk-managed approach might suffice in most instances of collections access, but there are certain legal requirements that the Armouries must resolutely observe. These institutional controls on case opening

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<sup>681</sup> Lambert, interview, 23 February 2023, p. 2.

<sup>682</sup> Matassa, *Organizing Exhibitions*, pp. 153-55.

<sup>683</sup> Robson, interview, 7 February 2023, p. 10.

<sup>684</sup> Royal Armouries, 'Collections Security Procedure', p. 3.

require careful coordination between the Armouries' registrar staff and their colleagues to maximise any available opportunities to undertake necessary work. A recent closure of the Tower of London by Historic Royal Palaces, for example, allowed staff from the Armouries to thoroughly clean the display cases in the White Tower – an impossibility under normal circumstances given the site's heavy visitor footfall and minimal out-of-hours access.<sup>685</sup> As exhibitions are primarily a visual form of access, even an act as mundane as cleaning the glass can improve audience engagement with these collections. Indeed, many of the reasons for opening display cases cited earlier in this paragraph (routine maintenance, rearrangement, reinterpretation) seek to enhance the overall visitor experience.<sup>686</sup> The Armouries is no exception in this regard. But the routine exhibition of weapons compels its registrar staff to exercise greater caution in reconciling the maintenance of high presentation standards with the observation of its regulatory obligations. Maintaining the integrity of weapons collections on public display demands diligence and flexibility in equal measure.

Providing access to the national collection of arms and armour through curated public displays is a serious undertaking. The greater legal, professional, and ethical responsibilities involved in the exhibition of weapons require the Armouries' registrar staff to enact additional precautions throughout the process. Determining an appropriate set of interconnected safeguards; closing off entire areas during installation; restricting involved staff to the bare minimum; enacting robust physical protections on the gallery floor; removing opportunities for outside interference; constantly monitoring object locations. All of these measures serve to reduce the risk involved in exhibiting weapons to a permissible level, a central feature of their responsible use.<sup>687</sup> Without this solid foundation, it would be difficult for the Armouries to contemplate the development of innovative approaches to the public display of its unique collections. It has certainly come a long way from the 'display of curiosities' that characterised early efforts to curate public exhibitions of the national collection of arms and armour.<sup>688</sup> While this can partly be ascribed to advances in other areas of museum practice – governance, curation, interpretation, education, design – it is also important to recognise the impact of the Armouries' registrar staff on its current displays. Their broad oversight of risk

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<sup>685</sup> Kaines, interview, 8 February 2023, p. 15.

<sup>686</sup> George, pp. 299-300.

<sup>687</sup> Cato, 'Risk Management Overview', p. 394.

<sup>688</sup> Lacy, p. 345.

management means they play a significant role in coordinating institutional colleagues, collections, and conventions in support of mediated collections access.<sup>689</sup> These routine actions may be less visible to external observers, but the ongoing development of the Armouries' displays would not be possible without their input. The contribution of registrar practice to this work can be better appreciated from a holistic perspective. If museum exhibitions are framed as an expanded process rather than a finished product – characterised by a shifting assemblage of individuals, objects, documents, and other material constructs – the contribution of registrars becomes clearer.<sup>690</sup> It is especially important at the Armouries, where the heightened demands of weapons regulation introduce numerous other agents. Its registrar staff are only set to become further preoccupied with exhibition planning in light of advanced institutional plans to create a dedicated temporary display space at its Leeds venue.<sup>691</sup> This should prove an effective strategy for facilitating access to a greater range of the Armouries' objects than is currently possible, but the caveat of this higher turnover is a corresponding growth in high-risk situations. Under current conditions, its registrar staff have developed functional procedures and relationships to accommodate the constraints governing the exhibition of its weapons collections. The challenge will be to maintain the necessary standards against a backdrop of growing expectations and aspirations.

### **External Access: Outgoing Loans**

Collections access is by no means confined to the spaces of an individual institution. Object loans offer museums the opportunity to enrich their public output through professional cooperation. Access is a key motivation for lending, as it enables different people to engage with the holdings of a lending institution.<sup>692</sup> Museums thus eagerly arrange loans as a means of expanding the reach of their collections beyond their immediate audiences. The Armouries certainly seeks to embrace the opportunities offered by a systematic lending strategy, stating its intent to fulfil all loan requests for public display provided certain operational and ethical criteria are met.<sup>693</sup> This receptive

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<sup>689</sup> Bell, interview, 7 February 2023, p. 4.

<sup>690</sup> David K. Dean, 'Planning for Success: Project Management for Museum Exhibitions', in *The International Handbooks of Museum Studies*, ed. by Helen Rees Leahy and Sharon Macdonald, 4 vols (Chichester: John Wiley & Sons, 2015), II: *Museum Practice*, ed. by Conal McCarthy, pp. 357-78 (pp. 358-59).

<sup>691</sup> McKnight, interview, 22 February 2023, pp. 14-15.

<sup>692</sup> Matassa, *Museum Collections Management*, p. 169.

<sup>693</sup> Royal Armouries, *Collections Access Policy*, p. 4.



approach cements object loans as a central component of its collections access provision. One of the main duties of the Armouries' registrar staff is to oversee this extensive programme, determining the feasibility of individual loans and bringing them to fruition. When lending objects for public exhibition, there is a fair amount of overlap with the processes around the development of internal displays. Licensing arrangements and venue security thus remain central preoccupations of the Armouries' registrar staff, with long-haul transport representing the main consideration largely specific to loans.<sup>694</sup> However, all of these duties are compounded by the need to assess the measures adopted by another institution. The particular demands of lending thus require a distinct management approach compared to other forms of exhibition, especially when weapons are involved. The prevailing regulatory assemblage subjects certain weapons to further security controls, while other items are classed as hazardous and thus require greater safeguards during the loans process.<sup>695</sup> Safety is again a paramount concern. The Armouries rarely lends any objects that may present an explosive hazard, for example, instead suggesting inert alternatives to eliminate the dangers posed by volatile material.<sup>696</sup> In other lower-risk situations, its registrar staff primarily work to mitigate the potential threats associated with the removal of weapons from secure institutional premises. The *National Heritage Act 1983* itself stipulates that risk is one of the main parameters in determining the Armouries' response to all loan requests (alongside its purpose, audience interests, borrower suitability, and the objects' physical condition and rarity).<sup>697</sup> Not that its registrar staff need any reminder of the importance of risk management. The special challenge of lending weapons is ensuring that the relevant regulatory controls are observed in a distinct institutional environment. This requires close collaboration with internal colleagues, professional counterparts, and sector experts. Therefore, it is the responsibility of the Armouries' registrar staff to harmonise individuals, frameworks, and objects in order to extend collections access to new audiences beyond its immediate geographic vicinity.

Before any loan can proceed, it is necessary to establish its viability. In the case of the Armouries' weapons collections, this involves confirming that the process can be conducted in compliance with the relevant regulatory frameworks. For domestic loans,

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<sup>694</sup> Simmons, 'Collections Management Policies', p. 35.

<sup>695</sup> Matassa, *Organizing Exhibitions*, pp. 262-64.

<sup>696</sup> Bell, interview, 7 February 2023, p. 11.

<sup>697</sup> *National Heritage Act 1983*, p. 14.

the main priority is to check that the borrower is appropriately licensed. Given that the Armouries avoids lending live explosives and that museums are exempt from controls on lending offensive weapons for cultural uses (see Chapter 1), this duty is effectively limited to its firearms collections. As firearms law operates on material possession rather than official ownership, any UK-based institution seeking to borrow a regulated firearm must have a valid Museum Firearms Licence.<sup>698</sup> Only firearms that are not regulated under the *Firearms Act 1968*, such as antiques, can be lent to an unlicensed institution. There is a specific entry in the Armouries' loans procedures instructing its registrar staff to confirm a borrower's licensing arrangements where necessary.<sup>699</sup> If the latter cannot secure a Licence, they have to consider alternative objects. Not only is the Armouries expected to appraise all potential loan partners, but it must also satisfy its own regulatory authorities in certain cases. If a loan includes Section 5 prohibited firearms, its registrar staff are obliged to notify the Home Office and they choose to inform the local police authority as an added precaution.<sup>700</sup> Although their motivations may be different to visitors and staff, they are also key stakeholders in the provision of access to weapons collections. Lending weapons internationally further complicates matters, not least because it introduces a new set of regulations. Should the Armouries wish to arrange a weapons loan with an overseas institution, it has to comply with arms embargoes and border controls.<sup>701</sup> This requires the assent of another supervisory body. When the Armouries seeks to lend weapons to non-embargoed countries, its registrar staff have to secure special export and import licences from the Department of Business and Trade for a whole range of items.<sup>702</sup> Once again, expanding access to museum weapons collections relies on the negotiation of governmental apparatus. Beyond its legal obligations, the Armouries has to determine whether prospective borrowers will be able to manage the risks of a weapons loan. Its registrar staff pay special attention to the emergency planning framework, assessing its contingencies should anything go awry.<sup>703</sup>

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<sup>698</sup> Robson, interview, 7 February 2023, p. 12.

<sup>699</sup> Royal Armouries, 'Loans Out Procedure' (unpublished internal document, 2022), p. 5.

<sup>700</sup> Home Office, *Firearms Licensing Law*, pp. 142-43; Bell, interview, 7 February 2023, p. 10.

<sup>701</sup> McKnight, interview, 22 February 2023, p. 5.

<sup>702</sup> Export Control Joint Unit and Department for Business and Trade, 'Exporting Firearms' <<https://www.gov.uk/guidance/firearms-and-export-control-forms>> [accessed 27 March 2023]; Department for Business and Trade, *UK Strategic Export Control List* (London: Department for Business and Trade, 2023), pp. 9-13, 48-49, 52-55; HM Revenue & Customs, Border Force, and Department for Business and Trade, 'Guns, Knives, Swords and Other Offensive Weapons: UK Border Control' <<https://www.gov.uk/guidance/import-controls-on-offensive-weapons>> [accessed 27 March 2023].

<sup>703</sup> Kaines, interview, 8 February 2023, p. 17; Dadson, pp. 221-22.

If these measures are not deemed robust enough for weapons collections, the advanced notice gives both parties time to work through any issues. Effective risk management for loans requires clear communication throughout the process. Ultimately, regular dialogue with borrowers and licensing authorities is crucial to fulfilling the regulatory conditions involved in widening access to the Armouries' weapons collections.

After confirming the general validity of the loan arrangements, the next stage is to conduct a thorough review of the borrowing venue and its security apparatus. The safeguards for the secure display of weapons collections are largely consistent, whether undertaken by the owner or a borrower.<sup>704</sup> But the need to corroborate their implementation by another institution adds an extra layer of complexity to the loans process. The main instruments utilised by the Armouries' registrar staff to assess the overall integrity of a prospective loan site are professional facilities reports. Borrowers are asked to complete a Facilities Report developed by the UKRG as well as its Display Case and Security Supplements.<sup>705</sup> These forms are industry standard and are not tailored to weapons loans, but the information they generate is most valuable. They provide a comprehensive overview of a venue's building fabric, surveillance measures, physical protections, and much else besides, allowing the Armouries' registrar staff to evaluate existing procedures and specify additional precautions if necessary.<sup>706</sup> With a baseline established, they can formulate a plan with their lending partners to manage the specific risks posed by the public display of weapons collections. The Armouries' registrar staff also draw on other sources of expertise to facilitate weapons loans in a safe and secure manner. As a national museum, the Armouries has to seek the approval of the MSPA based at ACE for every outward loan (see Chapter 2).<sup>707</sup> While this rule applies to all objects, the use of individual assessment means that the final verdict on a borrower's security framework considers the additional needs of weapons in such cases. The value of an expert second opinion cannot be understated when balancing the claims of access and safety. Once the overarching protections have been agreed, it is necessary to consider the prosaic work of handling and installing loaned weapons. This largely depends on the nature of the borrower. For institutions that have had limited contact with weapons collections, the Armouries can provide extra support on request. This

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<sup>704</sup> Wood and Gardner, pp. 142-44.

<sup>705</sup> UK Registrars Group, 'UKRG Documents' <<https://www.ukregistrarsgroup.org/resources/ukrg-docs/>> [accessed 27 March 2023].

<sup>706</sup> Robson, interview, 1 April 2022, p. 6; Kaines, interview, 8 February 2023, p. 17.

<sup>707</sup> Royal Armouries, 'Loans Out Procedure', p. 3.

ranges from the provision of training materials, through sending qualified staff to supervise the exercise, to performing the entire installation on their behalf – each tailored to borrower experience.<sup>708</sup> It is the responsibility of its registrar team and their institutional counterparts to determine together the best course of action in relation to the particular risk profile. As the national museum of arms and armour, the Armouries ultimately possesses the resources, expertise, and motivation to mobilise its weapons collections for the benefit of other institutions and their audiences. Accomplishing this smoothly requires its registrar staff to negotiate a robust package of safeguards.

The inspection of external venues alludes to another major stage of the loans process: transport. All objects must be safely conveyed between the lending and borrowing institutions, which are almost always located at different sites. As weapons in transit are not covered by the security apparatus of either venue, an alternative set of measures is required to mitigate any potential threats. The Armouries' registrar staff follow the combined transport provisions of GIS and the Firearms Security Handbook. They specify a range of safeguards to be observed during all external weapons transfers: multiple experienced personnel, witnessed loading and unloading, locked storage, solid physical protections, unbroken vehicle supervision, regular communication, tracking measures, detailed route planning, and established contingencies.<sup>709</sup> By drawing on complementary official guidelines, the Armouries' registrar staff are able to replicate a layered security apparatus when transporting its weapons collections. Risk management does not end at the boundaries of its sites. It even extends across national borders, as the international lending of weapons generates further transport requirements. In addition to export and import licences, the Armouries utilises dedicated shipping agents, sealed crates, and secure air cargo to fulfil overseas loans.<sup>710</sup> These measures are not specific to its weapons collections, but they are essential elements in assuring their safe international transit. While following standards of best practice suffices for the majority of weapons loans, there are instances where the transport of certain high-risk weapons is subject to further legal regulation. When sending Section 5 prohibited firearms on loan, the Armouries' registrar staff must use a transport agent approved by the Home Office.<sup>711</sup> This certification guarantees a level of protection proportional to the elevated

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<sup>708</sup> Robson, interview, 7 February 2023, pp. 12-13.

<sup>709</sup> Kaines, interview, 8 February 2023, p. 16; Arts Council England, *Government Indemnity Scheme: Guidelines*, pp. 81-83; Home Office, *Firearms Security Handbook*, pp. 26-29.

<sup>710</sup> Royal Armouries, 'Loans Out Procedure', pp. 6-8.

<sup>711</sup> McKnight, interview, 22 February 2023, p. 7.

demands of transporting these objects. Arranging the transport of loaned weapons is thus a serious undertaking for the Armouries' registrar staff, who designate a suitable shipper and work with them to determine the necessary safeguards. But this does not only apply to loans. When transferring weapons between its own sites for internal purposes – exhibition, research, storage, conservation – the Armouries also employs a qualified transport agent with competent personnel and enhanced security features.<sup>712</sup> After all, the potential risks of transporting weapons are the same whether for institutional use or external loans. A former NSA has perhaps best encapsulated the prevailing attitude towards object transit in the museum sector: 'we don't want to be the hare; we want to be the tortoise.'<sup>713</sup> The Armouries' registrar staff certainly adopt the considered approach to the transport of its weapons collections that this assessment conveys. Providing access to these regulated objects beyond their home venue could not rightfully go ahead without the assurance of their safe arrival and return.

Overall, the facilitation of access to the Armouries' weapons collections through inter-institutional loans undoubtedly requires substantial preparation. The regulatory assemblage heavily informs the actions of its registrar staff, requiring them to enact a series of additional precautions across the fields of licensing, venue security, and transport. Marrying the provisions of weapons law, official guidance, and professional standards, they have developed a risk-managed approach to the distinct challenges of lending weapons at national and international levels. Their verification of borrower security arrangements is one constituent element; the use of specialised transport agents is another. In this way, the Armouries' registrar staff are able to administer a responsive yet secure lending programme, a core component of its guiding institutional mission.<sup>714</sup> Given the inherently cooperative nature of loans and the added complexities of weapons collections, sustained collaboration is central to their realisation of this aim. Not only do the Armouries' registrar staff work closely with their counterparts at the borrowing institution throughout the process, but they also liaise with a series of expert assessors, licensing authorities, law enforcement bodies, and transport companies to determine a suitable approach. An ethos of partnership is essential to this enterprise, as the serious demands of a weapons loan are best addressed through strong working relationships

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<sup>712</sup> Robson, interview, 7 February 2023, p. 11.

<sup>713</sup> William Brown, 'Cultural Protection Services - Secure Transportation of Art and Collections', lecture (Trident Manor Training Academy, 28 March 2023).

<sup>714</sup> *National Heritage Act 1983*, p. 14; Royal Armouries, *Collections Access Policy*, p. 4.

between all parties.<sup>715</sup> As representatives of the national museum of arms and armour, the Armouries' staff actively seek to share their experience of weapons management with institutional partners. Loans amount to more than the physical transfer of objects; they facilitate the spread of best practice throughout the cultural sector. As a means of disseminating both objects and knowledge, loans will likely remain a vital strand of collections access for the foreseeable future.<sup>716</sup> It will thus be the duty of the Armouries' registrar staff to continue refining the institutional process for lending its weapons holdings. One of their greatest challenges will be to assure the viability of its loans programme in a changing world. The pressure on museums to achieve environmental and financial sustainability is steadily growing, while loans impose a sizable burden on both counts.<sup>717</sup> Lending may have to be curtailed in response. These developments could jeopardise the future of weapons loans in particular, as their enhanced protections are especially resource intensive.<sup>718</sup> There is no easy solution to the competing claims of access, safety, value, and longevity generated by this situation. The Armouries' registrar staff thus face an arduous task in enabling wider audiences to engage with its weapons collections while mitigating the evident risks to individuals, objects, and environments.

### **Digital Access: Virtual Encounters with Restricted Objects**

The last key form of access to the Armouries' weapons collections does not just outstrip its institutional walls, it almost entirely transcends the physical plane. Digital access in its various forms is now firmly established as a means of sharing museum collections with audiences beyond their immediate vicinity.<sup>719</sup> This process was accelerated by the COVID-19 pandemic, as institutions across the sector hastened to realise 'meaningful digital practice' during their forced closure.<sup>720</sup> The Armouries is no exception. Its latest Corporate Plan promises to 'harness the power of digital to increase both our online and onsite audiences', an endeavour in which its collections will play a central role.<sup>721</sup> The

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<sup>715</sup> McKnight, interview, 22 February 2023, p. 5.

<sup>716</sup> Wood and Gardner, p. 148.

<sup>717</sup> Sarah Nunberg, Matthew J. Eckelman, and Pamela Hatchfield, 'Life Cycle Assessments of Loans and Exhibitions: Three Case Studies at the Museum Fine Arts, Boston', *Journal of the American Institute for Conservation*, 55 (2016), 2-11 (p. 2); Kaja Jurčišinová, Marline Lisette Wilders, and Janneke Visser, 'The Future of Blockbuster Exhibitions After the Covid-19 Crisis: The Case of the Dutch Museum Sector', *Museum International*, 73.3-4 (2021), 20-31 (p. 28).

<sup>718</sup> Kaines, interview, 9 May 2022, p. 17.

<sup>719</sup> Giannini and Bowen, pp. 193-94.

<sup>720</sup> King and others, p. 501.

<sup>721</sup> Royal Armouries, *Corporate Plan 2023-2028*, p. 4.

basic mechanics of digital collections access at the Armouries follow an established pattern. Its collecting remit does not readily include born-digital objects, so digital access to collections instead entails engagement with virtual instances (or copies, surrogates, replicants, facsimiles) of physical ‘originals’.<sup>722</sup> The digital dissemination of its weapons collections thus relies on the reproduction of 2D images or 3D models and their accompanying information. The core of the Armouries’ digital access provision is its online collections database, which features records for nearly 66,000 of its objects.<sup>723</sup> With an internet enabled device and a stable connection, anyone in principle can access this extensive virtual library at all times. To complement this extensive but passive resource, the Armouries also showcases its collections on numerous social media channels. It thus maintains accounts on Facebook, Twitter, Instagram, and YouTube to actively engage digital users with its collections.<sup>724</sup> These outputs are rather distinct in focus, but they both depend on accurate and inclusive documentation. Even in the more emergent field of digital collections practice, the Armouries’ registrar staff manage this work in compliance with the prevailing obligations. Yet, digital access is mostly absent from the regulatory assemblage surrounding weapons. The almost exclusive emphasis of weapons law on regulating their physical possession means that no specific legal restrictions apply to virtual interaction (see Chapter 1). Even the relevant professional frameworks only mention the specific access needs of digital collections sparingly.<sup>725</sup> To use an apt metaphor, this comparative lack of regulation is a double-edged sword for the Armouries’ registrar staff. It does allow greater institutional freedom in the use of its weapons collections, but it also means there is less guidance to help them negotiate the idiosyncrasies of digital access. Confidentiality, security, and sensitivity are all serious matters in the virtual dissemination of weapons collections. The Armouries’ registrar staff are thus obliged to address these challenging subjects if its digital strategies are to provide an effective alternative to more constrained forms of physical access.

A cornerstone of digital collections access is responsible data management. From its outset, there has been the subtle distinction that virtual access in museums relates more to object data than to the physical originals.<sup>726</sup> On digital platforms, users

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<sup>722</sup> Meehan, pp. 420-21.

<sup>723</sup> Royal Armouries, 'Royal Armouries Collections' <<https://collections.royalarmouries.org/>> [accessed 3 December 2023].

<sup>724</sup> Board of Trustees of the Royal Armouries, *Annual Report and Accounts 2021-22*, p. 20.

<sup>725</sup> British Standards Institution, *BS 17820*, p. 10; Museum Accreditation, *Accreditation Guidance*, p. 64.

<sup>726</sup> Michael A. Fopp, 'The Implications of Emerging Technologies for Museums and Galleries', *Museum Management and Curatorship*, 16 (1997), 143-53 (p. 149).

engage with a variety of faithful representations in the format of written descriptions, 2D images, 3D models, video footage, sound recordings, and so forth. It thus follows that digital access can be improved by increasing the quantity and quality of all the available information, whether textual, visual, or aural. This is an aspiration of the Armouries, whose registrar staff work with their curatorial colleagues to publish all available material about its collections online.<sup>727</sup> As with the various forms of physical access, however, the public dissemination of object records is subject to certain caveats. Its registrar staff must ensure that some datasets remain confidential, as specified by the prevailing regulatory assemblage. Location records and donor information are two key examples of sensitive data for which museums often need to make special provision.<sup>728</sup> In the case of the Armouries' weapons collections, both of these fields take on special significance. Given the high-risk nature of these objects, it is institutional policy not to publish their detailed locations on its online collections portal. Only the overall gallery is named for items on public display, while objects in storage are assigned the blanket label of 'Study Collection'.<sup>729</sup> Advertising the precise whereabouts of a substantial store of weapons could attract criminal interest. This example illustrates the convergence of virtual and material agents in the routine provision of collections access, as digital safeguards contribute to physical security and vice-versa. Similar restrictions exist on the digital publication of donor information, although their rationale does differ. Not only is the Armouries bound by general data protection rules, but it also has a duty to avoid revealing the details of other custodians of weapons collections.<sup>730</sup> Personal data or current addresses held for internal management purposes cannot be published online. The necessary checks have been built into the Armouries' collections management system in the form of two separate 'Acquisition' and 'Provenance' tabs. The former is designed to hold all private data on associated parties solely for internal management purposes, while the latter presents the same information in a reduced and anonymous format to be shared online.<sup>731</sup> This functional distinction helps the Armouries' registrar staff to balance institutional commitments to both donor confidentiality and transparent object provenance. The challenging history of many individual weapons makes the simultaneous observation of these duties especially important. Although weapons law

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<sup>727</sup> Lambert, interview, 23 February 2023, p. 13.

<sup>728</sup> British Standards Institution, *PAS 197*, p. 19.

<sup>729</sup> Bell, interview, 7 February 2023, p. 12.

<sup>730</sup> Robson, interview, 7 February 2023, p. 14; Kaines, interview, 8 February 2023, p. 20.

<sup>731</sup> Royal Armouries, 'Cataloguing Procedure', pp. 21-24.



remains silent on the issue, other facets of the regulatory assemblage thus control the online dissemination of sensitive collections information. Just because the immediate physical harm posed by the Armouries' weapons collections is effectively neutralised, this does not mean that digital access to them is risk-free.

It is not enough to be selective in the publication of digital collections data, however, this information must also be actively protected at its source. Security is a defining theme of the Armouries' efforts to facilitate access to its weapons collections, but it takes on a distinct complexion when applied to the digital sphere. One of the most prominent differences is its international scope, rather than just remaining a local or national concern. The same online technology that enables audiences worldwide to access the Armouries' weapons holdings on demand also exposes them to threats on a global scale.<sup>732</sup> Hence the need for robust digital safeguards. The Armouries' registrar staff are primarily responsible for coordinating physical security (see Figure 1), so it follows that they have shaped its digital security apparatus alongside their IT colleagues and external system providers. Instead of layered physical barriers, surveillance, and identification, it features an equivalent series of firewalls, backups, and passwords.<sup>733</sup> Redundancy is thus built into the system as a means of maintaining its overall integrity should any of these individual protections fail. The individual safeguards might differ, yet the underlying 'onion principle' remains in place. But despite the growing urgency for robust digital security, the regulatory assemblage governing the Armouries' weapons collections has been slow to address it. The most recent incarnations of BS 17820 and the MAS additional guidance have begun to rectify this situation, exhorting museums to provide secure storage, accessible copies, and clear metadata for the long-term preservation of their digital records.<sup>734</sup> These are key aspects of digital security provision, but this advice neither constitutes a comprehensive operational framework nor addresses the heightened needs of weapons collections. The emergent nature of current practice has made it a pressing concern at the Armouries. In January 2022, it weathered a serious cyber-attack that severely disrupted its communications, wiped many of its recent backups, and severed the connection to its online collections

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<sup>732</sup> McKnight, interview, 22 February 2023, p. 14.

<sup>733</sup> Suzanne Quigley and Cristina Linclau, 'Computer Systems and Data Management', in *MRM6: Museum Registration Methods*, ed. by John E. Simmons and Toni M. Kiser, 6th edn (Lanham: Rowman & Littlefield, 2020), pp. 174-96 (pp. 191-92).

<sup>734</sup> British Standards Institution, *BS 17820*, p. 19; Museum Accreditation, *Accreditation Guidance*, p. 51.

database.<sup>735</sup> No confidential data pertaining to its weapons collections appears to have been compromised in the event, but this major incursion has compelled the Armouries to strengthen its provisions for cyber security and data management. Its registrar staff are playing their part in this concerted institutional programme to shore up its defences, combining digital and material measures. They are working to implement staff training, standard procedural frameworks, incident response plans, confidential data transfer, retention protocols, and so on.<sup>736</sup> All are key components of a holistic strategy designed to fortify the virtual integrity of the Armouries' holdings. Robust safeguards are proving ever more paramount in light of the concerning trend for high-profile cyber incursions targeting cultural institutions.<sup>737</sup> It is no surprise then that the Armouries' personnel are making strenuous efforts to render digital access to its weapons collections just as secure as equivalent forms of physical engagement.

Beyond the protection of object data, digital access to the Armouries' weapons collections is also informed by a strong ethos of inclusivity and sensitivity. There is a general expectation that museums will demonstrate respectful language and behaviour across their output.<sup>738</sup> But the process of developing inclusive content starts long before public dissemination. The Armouries' registrar staff are thus working to alter problematic historical terms entered in its object records, many of which pertain to weapons associated with imperial or colonial contexts.<sup>739</sup> As the Armouries' online programming draws heavily on its internal collections data, such efforts are central to fostering more inclusive treatment of these multifaceted collections. This work helps to satisfy professional aspirations in this area. The ICOM Code of Ethics urges museums to 'give responsible consideration' to how the presentation of objects and information might affect their various audiences.<sup>740</sup> Weapons can prove particularly sensitive in this respect, given their close association with violence. The Armouries has received criticism from certain quarters for uploading pre-scheduled social media posts about weapons after high-profile violent incidents.<sup>741</sup> While the content of digital access is largely beyond the purview of its registrar staff, they must remain wary of the emotive

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<sup>735</sup> Board of Trustees of the Royal Armouries, *Annual Report and Accounts 2021-22*, p. 14.

<sup>736</sup> Jen Kaines, Jill McKnight, and Katie Robson, 'Cyber Attacks! The Risks and Lessons Learnt', conference paper, *ERC 2022* (Strasbourg, 4 November 2022).

<sup>737</sup> British Library, *Learning Lessons from the Cyber-Attack: British Library Cyber Incident Review* (London: British Library, 2024), pp. 2-3.

<sup>738</sup> Chapman, p. 270.

<sup>739</sup> Kaines, interview, 1 August 2022, p. 6.

<sup>740</sup> International Council of Museums, *ICOM Code of Ethics*, pp. 25-26.

<sup>741</sup> Bell, interview, 1 August 2022, pp. 1-2.

force of its weapons collections. This is certainly apparent in their approach to the most challenging objects under their charge. There are certain weapons in the Armouries' possession, namely those linked with modern criminality, that are withheld from public view altogether due to their sensitivity.<sup>742</sup> The decision to restrict access to any object belonging to the national collection is not taken lightly by its staff. But in some instances, where digital transmission might cause clear distress to certain individuals or groups, social wellbeing is deemed to outweigh the need for immediate access. In each case, the disclosure of such difficult objects will only be reconsidered once an appropriate critical distance has been reached.<sup>743</sup> The right moment is unique to the circumstances of an individual weapon. In practical terms, this process is again managed through the Armouries' internal collections management system. The ability to publish records is limited to a few collections staff to ensure that only suitable weapons and their accompanying data are presented online.<sup>744</sup> The objects cleared for public distribution are distinguished by a globe symbol (see Figure 12). This active check on online collections dissemination reduces the overall likelihood of premature or inopportune action. Through their oversight of routine documentation, the Armouries' registrar staff are thus key actors in enacting ethical approaches to digital weapons access. After all, the moral complexities of facilitating public engagement with objects linked to violence are not going to disappear overnight.

The provision of digital access to weapons collections is a major undertaking in its own right. As the prevailing regulatory assemblage is only just beginning to address its enhanced role in museum practice, the Armouries' registrar staff routinely work through its operational ramifications on the ground. The scarcity of external guidance makes their pursuit of a risk-managed approach especially vital to the facilitation of online weapons access. The scope of these strategies extends well beyond the virtual sphere, such as the need to withhold the detailed location of weapons for their physical protection. Digital measures have material consequences and vice-versa.<sup>745</sup> The Armouries' registrar staff accommodate these complex interactions through the layered application of digital safeguards, the compartmentalisation of collections data, and the selective publication of object records. Delivering a digital access strategy that respects

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<sup>742</sup> McKnight, interview, 22 February 2023, p. 13.

<sup>743</sup> Bell, interview, 7 February 2023, pp. 12-13.

<sup>744</sup> Lambert, interview, 23 February 2023, pp. 14-15.

<sup>745</sup> Arvanitis and Zuanni, p. 143.

the claims of confidentiality, security, and sensitivity requires their close attention. Despite this considered approach, however, the provision of digital access to the Armouries' weapons collections must continue to evolve. As audience expectations of online interaction with museum objects are raised by technological advances, routine operations have to keep pace with these developments.<sup>746</sup> The Armouries' registrar staff have a substantial task before them, encompassing all levels of institutional practice. None of its policy documents expressly address digital collections access, for example, so the relevant processes are currently scattered across its operational framework.<sup>747</sup> Resolving this situation will involve the codification of best practice across a range of fields, based on interdepartmental cooperation across the Armouries. This will help to establish clear processes for the proper digital dissemination of weapons collections. There are also more prosaic actions that the Armouries' registrar staff can take to enhance its online access. Collections documentation would certainly benefit from greater attention. Far from providing comprehensive textual and visual information, many of the Armouries' current object records only include an accession number and a basic title (i.e., 'gun').<sup>748</sup> It must be said that the scale of this task combined with the realities of limited staff capacity means their improvement will necessarily take time. Only so much can be done by a department of five permanent individuals, whose duties are hardly confined to updating its collections database (see Figure 1). It is thus natural that the Armouries is working to expand its overall digital capabilities. Both operational and procedural issues are being addressed as part of its ongoing Digital Vision Project, an institution-wide initiative to overhaul its digital offer.<sup>749</sup> Committed investment of time, effort, and resources is essential to realising the full potential of digital collections access. Only with sustained support will the Armouries' registrar staff be able to establish digital engagement with its weapons collections on a sound enough footing to serve as a meaningful alternative to heavily circumscribed forms of physical access.

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<sup>746</sup> Paul F. Marty, 'Information Organization and Access', in *Museum Informatics: People, Information, and Technology in Museums*, ed. by Paul F. Marty and Katherine Burton Jones (Abingdon: Routledge, 2008), pp. 79-83 (p. 82).

<sup>747</sup> Bell, interview, 7 February 2023, p. 12.

<sup>748</sup> Kaines, interview, 8 February 2023, p. 20.

<sup>749</sup> Board of Trustees of the Royal Armouries, *Annual Report and Accounts 2021-22*, p. 19.

### **Peeling Back the Onion: Registrars and Weapons Access**

In light of the restraints imposed by the prevailing regulatory assemblage, the provision of access to museum weapons holdings is a multifaceted endeavour. In seeking to make its national collection a genuine ‘resource for all’, the Armouries has developed a wide-ranging access programme.<sup>750</sup> Its use of weapons in handling sessions, demonstrations, research visits, temporary displays, permanent galleries, outward loans, digital content, and social media outreach presents a range of unique challenges. In response, the Armouries’ registrar staff have embedded their additional needs throughout its routine operations. They coordinate the necessary safeguards across their occupational remit: documentation, inventory control, storage, security, handling, packing, transport, loans administration, and exhibition management.<sup>751</sup> Weapons or otherwise, all of its objects stand to benefit from the ongoing maintenance of enhanced collections integrity. But there does need to be a certain level of flexibility within the system, as the delivery of collections access is closely dependent on the nature of the relevant objects.<sup>752</sup> This principle encompasses the different types of weaponry in the Armouries’ collections. Firearms present more of an elevated security risk than an immediate safety hazard, when separated from their ammunition. In contrast, edged weapons can easily cause personal harm but are less of an existential threat. Live explosives meanwhile pose considerable danger to both safety and security, so deactivated examples are generally used for collections access. The protective measures implemented by the Armouries’ registrar staff thus vary accordingly. Central to their efforts is the guiding principle of risk management. Risk may be manifested in diverse forms (physical injury, emotional trauma, criminal interest, legal infraction, professional censure) and it may threaten different groups (visitors, staff, institutions, society), but the Armouries’ registrar staff must ultimately determine the appropriate level of mitigation in all cases. As risk is a malleable and subjective concept, its managers must be correspondingly responsive.<sup>753</sup> Even where access to the Armouries’ weapons collections is forbidden by the regulatory assemblage – such as the possession of firearms by ‘prohibited persons’ – it does not deter their efforts. It is standard practice that the Armouries will explain any restrictions to its collections and proactively seek to make alternative access arrangements.<sup>754</sup> This

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<sup>750</sup> Keene, p. 187.

<sup>751</sup> Bowes, 'Museum Registrar as "Assembled Role"', p. 68.

<sup>752</sup> Miller, p. 86.

<sup>753</sup> Cato, 'Risk Management Overview', p. 395.

<sup>754</sup> Royal Armouries, *Collections Access Policy*, p. 3; Bell, interview, 7 February 2023, p. 5.

is one major advantage of developing a diverse programme of object engagement. A prohibited person who cannot legally access the study collection, for example, can still engage with the Armouries' weapons holdings through exhibitions or digital outputs. It is thereby able to deliver on its public mandate while continuing to observe its inviolable regulatory obligations. Without the resolute oversight of its registrar staff, the Armouries would be heavily constrained in facilitating meaningful collections access in light of the tensions generated by its role as the national museum of arms and armour.

Given its scale and complexity, the provision of access to the Armouries' weapons collections is hardly a task that one small department can undertake alone. In fulfilment of this duty, its registrar staff participate in a series of intersecting and overlapping networks. The needs of collections access compel them to develop an array of working relationships within and beyond institutional boundaries. The Armouries' registrar staff have cultivated considerable knowledge of weapons management, but they are prepared to seek the support of other experienced parties where necessary.<sup>755</sup> Cooperation is thus essential to the effective management and use of the Armouries' holdings. To this end, its registrar staff work with a variety of professional colleagues: curators, conservators, technicians, designers, architects, security personnel, transport specialists, customs officers, and many others.<sup>756</sup> When facilitating access to its weapons collections, more parties can be added to this list: police, law enforcement, licensing authorities, government officials, cultural experts, and certified shippers. The groups involved often differ between each type (and even each instance) of collections access, but collaborative endeavour remains an enduring constant. The Armouries' registrar staff are central players in bringing together these networks to further access to its weapons collections.<sup>757</sup> Yet, individual agency is not the only force at work. If the regulatory frameworks surrounding museum weapons collections can be framed as an assemblage, then the institutional apparatus coordinated by the Armouries' registrar staff to meet its demands constitutes one too. In line with actor-network theory, non-human agents are also vital here. Policy, procedure, and personal decisions continuously interact to generate 'the networks of connection and association' that cement museum practice.<sup>758</sup> The Armouries' registrar staff monitor these myriad interconnections with

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<sup>755</sup> Lambert, interview, 23 February 2023, pp. 8-9.

<sup>756</sup> Case, p. 25; Vassal and Daynes-Diallo, p. 65.

<sup>757</sup> McKeen, pp. 19-20.

<sup>758</sup> Rex, p. 188.

the aim of directing their outcome to support the safe and legal provision of collections access to its weapons collections. Its procedural frameworks are major actors in this process, as both the latest iteration of institutional thinking and a blueprint for routine practice. They also exemplify the shifting interplay of human and non-human agents throughout this system. The effectiveness of the Armouries' collections procedures is regularly reviewed by its registrar staff with reference to their colleagues, then any alterations feed back into its routine work streams, and the cycle repeats.<sup>759</sup> They are thus a codified expression of the ongoing dialogue between individuals, standards, and processes that underpins access to weapons holdings. The Armouries' reconciliation of its competing duties to safety, security, and public service requires the coordination of these many assorted actors. Its registrar staff occupy a central position in the expansive operational assemblage that mirrors, anticipates, and responds to the regulatory apparatus governing engagement with the national collection of arms and armour.

The practical and conceptual structures underpinning the use of the Armouries' weapons holdings offer considerable insight into its engagement with current notions of collections access. First, they underscore its professional commitment to improving the accessibility of museum objects. There has been a profound shift in the perceived role of museums over the last 50 years, from collections-oriented institutions to people-oriented institutions.<sup>760</sup> Many collections personnel themselves have embraced this move from institutional gatekeeping towards inclusivity, where collections management directly serves public access. The Armouries' registrar staff have ardently adopted this outlook, as they seek to maximise access to its weapons holdings by default and only restrict it when compelled to do so by external regulation.<sup>761</sup> If their example is in any measure representative of the wider field, then sector support for collections access can hardly be doubted. Of course, this association works both ways. The use of weapons in museum programming also affirms the centrality of rigorous collections management to the successful delivery of collections access.<sup>762</sup> While the Armouries' registrar staff may face especially stringent regulatory constraints, they adopt strategies familiar to most registrars when reconciling them with institutional commitments to access. Neither risk analysis, nor layered safeguards, nor thorough documentation are exclusive to weapons

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<sup>759</sup> Kaines, interview, 8 February 2023, p. 5.

<sup>760</sup> Mason, Robinson, and Coffield, pp. 19-20.

<sup>761</sup> Kaines, interview, 8 February 2023, p. 6.

<sup>762</sup> Simmons, 'Collection Care and Management', p. 240; Matassa, *Museum Collections Management*, p. 242; Keene, pp. 180-81.

management. The experience of the Armouries' registrar staff is thus typical in one respect at least, as coordinators of institutional collections access through their operational oversight of object stewardship. Their contribution in this area reaches a more expansive audience than is commonly appreciated. There has been a tendency within the sector to use the term 'access' as a shorthand for visitor access.<sup>763</sup> But the example of the Armouries challenges this generalisation. While the general public is clearly a key beneficiary of seamless collections engagement, it is also true that staff, contractors, affiliated researchers, and government personnel all require various degrees of access appropriate to their purposes. Moreover, the needs of these stakeholders will keep changing over time. The dramatic expansion of digital collections access over the last few decades provides some idea as to what this might entail. The relative novelty of digital access means that the Armouries is still in the process of working through its full ramifications, as part of general sector efforts to enhance the value of virtual and hybrid outputs in the post-pandemic landscape.<sup>764</sup> Determining the right measures to facilitate object engagement requires sustained institutional attention in every instance. New audiences, new technologies, and new expectations will continue to influence future manifestations of collections access. It will thus be the duty of the Armouries' registrar staff and their professional counterparts to address the unforeseen challenges that the ongoing development of museum practice will inevitably generate.

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<sup>763</sup> International Council of Museums, *ICOM Code of Ethics*, p. 8; Museums Association, *Code of Ethics*, p. 14; Museum Accreditation, *Accreditation Standard*, p. 9.

<sup>764</sup> Bell, interview, 7 February 2023, p. 12; Samaroudi, Echavarria, and Perry, pp. 357-58.



## Museums, Registrars, and the Future of Public Weapons Collections

I think there's always going to be a role for a museum like the Armouries, because until war is completely eradicated or owning a firearm, owning weapons, or anything like that, because people have them for lots of different reasons. A big part of our collection is collecting new weapons as well as older weapons, interesting weapons that come up that we don't have any of already, or a limited amount. Because the way attitudes are changing and sensitivities around certain subjects, it could become more difficult for the Armouries. It could become an obsolete museum. But I don't think realistically that would happen for a long, long time.<sup>765</sup>

The 700<sup>th</sup> anniversary of the Armouries' administration of the official collection of arms and armour has prompted serious reflection about its future. Its intentions are certainly ambitious. The Armouries' latest Corporate Plan commits it to becoming a sustainable and proactive leader in the field of arms and armour.<sup>766</sup> Effective use of its restricted collections will be central to realising this grand vision. It would be difficult for the Armouries to lay claim to this mantle if a significant proportion of its holdings were essentially inaccessible to its stakeholders. However, accomplishing these strategic objectives as the custodian of this distinct part of the national collection will not be without its challenges. The opening quotation references its constant struggle for relevance in a changing world. As attitudes to the complex role of weapons evolve, the Armouries will have to adapt its engagement strategies and management processes accordingly. It also faces considerable pragmatic concerns. Like the museum sector in general, the Armouries is adjusting to the stark realities of a post-pandemic landscape: income shortfalls, rising operating costs, overstretched staff, and faltering attendance.<sup>767</sup> In this challenging environment, there is evident value in a coordinated management strategy that streamlines the provision of access to restricted objects in order to better leverage institutional capacity. Not even national museums have infinite resources at their disposal.<sup>768</sup> Despite the difficult circumstances, the Armouries' registrar staff still have to weather the unique challenges of weapons stewardship. Ultimately, the right to access the national collection of arms and armour rests upon firm legal foundations. While there have been recent calls to amend the *National Heritage Act 1983* – the

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<sup>765</sup> Lambert, interview, 23 February 2023, p. 15.

<sup>766</sup> Royal Armouries, *Corporate Plan 2023-2028*, p. 3.

<sup>767</sup> Museum Development England, *Annual Museum Survey 2023: National Report* (London: Arts Council England, 2023), pp. 5-7.

<sup>768</sup> Bell, interview, 7 February 2023, p. 16.

source of the Armouries' public obligations – these have targeted the process of object disposal rather than the general principle of collections access.<sup>769</sup> Any revision of its core institutional purpose appears unlikely for the foreseeable future. As long as there is public interest in weapons, it will remain the Armouries' duty to provide access to its collections for the benefit of society. Its registrar staff play a crucial role in the delivery of this fundamental mission, thereby helping to assure its continued cultural relevance. As the last four chapters have demonstrated, they have developed sophisticated strategies to mediate the claims of regulation, ethics, and access on the Armouries' weapons holdings. In reviewing their approach to these key museological preoccupations, it is worth returning to the guiding research questions of this thesis.

What are the regulatory frameworks that govern access to museum weapons collections, and how have their shifting parameters shaped the institutional obligations of the Royal Armouries?

The first two chapters established that the regulation of the Armouries' weapons collections is a complex and multi-layered process. It encompasses a formidable array of statutes, agreements, and standards across a range of policy areas. Out of these many entangled frameworks, legislation exercises the greatest control over the use of museum weapons collections.<sup>770</sup> Given its specialisation, the Armouries is bound by the demands of weapons law. But these are not imposed uniformly across its holdings. The cumulative impact of historically contingent actions has produced the distinct traditions of offensive weapons law, firearms law, and explosives law – each imposing different constraints on the use of the Armouries' collections.<sup>771</sup> Its edged and melee weapons are almost entirely exempt from offensive weapons law, as their cultural value in a museum setting is perceived to outweigh their capacity for harm. Its firearms collections, by contrast, are subject to a dedicated licensing regime and targeted prohibitions given their heightened security risk. The regulation of its explosive material is different again, characterised by a two-stage licensing framework and proportional storage thresholds for the purpose of maintaining public safety. Weapons law thus places substantial but uneven checks on the Armouries' collections. But this is not their only source of legal control. As a national museum, the Armouries' duty to provide access to its collections

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<sup>769</sup> Eren Waitzman, 'Reviewing the National Heritage Act 1983', *House of Lords Library* (2022) <<https://lordslibrary.parliament.uk/reviewing-the-national-heritage-act-1983/>> [accessed 24 May 2023].

<sup>770</sup> Selwood and Davies, pp. 44-45.

<sup>771</sup> Fortson, 'Acid, Knives, and Firearms', p. 128.

is also enshrined in statute.<sup>772</sup> The competing claims of weapons law and heritage law generate much of the tension inherent to its weapons collections – the former works to restrict access while the latter seeks to encourage it. This dissension is only reinforced by the professional standards of collections management observed by the Armouries. Their broad nature means they impose few specific constraints on weapons collections. Yet their simultaneous promotion of safety and security, on the one hand, and public access, on the other, further entrenches the Armouries’ dilemma. There is still a certain degree of flexibility within this apparatus. Following the principles of assemblage theory, the prevailing regulatory structures are often altered and reinterpreted through the action of other agents.<sup>773</sup> Both legislative and professional frameworks are updated in response to contemporary developments, while the distinct priorities of regulatory authorities, government officials, cultural bodies, and museums can produce competing interpretations of pivotal provisions. Overall, the regulation of museum weapons collections is as much a product of negotiation as of imposition. Establishing the Armouries’ obligations under this elaborate edifice is thus itself a serious undertaking for its registrar staff, let alone maintaining institutional compliance with its terms.

How do ethical principles inform the approach of the Royal Armouries’ registrar staff to the challenges of managing its weapons collections in a responsible and viable way?

Beyond the legal and professional frameworks, ethical directives constitute the third major component of the regulatory assemblage governing the use of the Armouries’ weapons collections. These precepts manifest themselves in a variety of forms. Most evident are the professional codes of ethics that the Armouries observes as an active member of the museum community. Given their shared role in the self-regulation of sector practice, these codes detail many of the same methods for the proper stewardship of museum objects as the standards of collections management.<sup>774</sup> They reinforce the Armouries’ duties to public safety, national security, and collections access in the use of their weapons collections, albeit from a more explicit ethical perspective. However, the role of ethics in weapons management cannot be confined to general statements of best practice. Dialogue, deliberation, and reflection within and between museums are just as important to the development of ethical approaches – rooted in the cultivation of ethical

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<sup>772</sup> *National Heritage Act 1983*, pp. 11-15.

<sup>773</sup> Macdonald, p. 118.

<sup>774</sup> Edson, p. 177.

conduct by museum registrars and their colleagues.<sup>775</sup> What constitutes ethical use of the Armouries' weapons collections is subject to constant evolution as its registrar staff encounter the upheavals of everyday practice. In this sense, these obligations act less as fixed constraints than as an ongoing cycle of exercise, review, and reconfiguration. The unique workings of the Armouries dictate that this process primarily draws on internal reference points, but its registrar staff do also monitor wider professional developments and actively seek external support in certain intractable situations. Ethical museum conduct emerges from the intersection of a diverse array of agents.<sup>776</sup> It is possible to trace these models of museum practice back to core philosophical values. At the heart of all museum programming is a compromise between the use and preservation of their objects, requiring each institution to weigh up the respective interests of current and future users. Weapons collections introduce a third major variable, the need to mitigate any potential damage they might cause.<sup>777</sup> Instead of maximising the benefit from public engagement with these collections, this duty is predicated on minimising harm – a more urgent responsibility on balance. This is the source of the ethical dichotomy that pervades the entire regulatory assemblage. Museums are exhorted to provide access to their weapons collections in the name of public benefit, yet they are simultaneously pressed to restrict access to them for the protection of that very same public. The collections access strategies delivered by the Armouries' registrar staff are essentially designed to address the discrepancy of these ethical imperatives.

What policies and procedures do the registrar staff at the Royal Armouries implement to facilitate meaningful access to its weapons collections, and how can these be refined going forward?

Given the enormity of the Armouries' legal and ethical duties as the national museum of arms and armour, the process of providing access to its weapons holdings is equally elaborate. The fundamental claims of safety and security impact its various modes of collections access in different ways. The unique needs of direct interaction, exhibitions, loans, and digital content require the Armouries' registrar staff to tailor institutional preparations to each form of public engagement. These efforts mobilise an array of functions across the remit of registrar practice, from inventory control to transport.<sup>778</sup>

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<sup>775</sup> Yerkovich, p. 454.

<sup>776</sup> Marstine, Dodd, and Jones, p. 72.

<sup>777</sup> Hill, p. v.

<sup>778</sup> Bowes, 'Museum Registrar as "Assembled Role"', p. 70.

The Armouries' procedural framework is central to this undertaking, as the mechanism that embeds legal and ethical requirements across key areas of institutional practice – collections security, visitor access, loans out, or cataloguing. These working documents are continuously assessed, altered, and augmented by its registrar staff to better address the access needs of its weapons collections. This versatility empowers the Armouries' personnel to respond to the shifting networks of agents that constitute its operating environment.<sup>779</sup> Across the diverse public uses of the Armouries' weapons collections, there are certain key principles that invariably underpin the work of its registrar staff. Risk management informs their entire approach to collections access. Total elimination of the heightened risks associated with weapons is implausible, so they work instead to reduce it to manageable levels.<sup>780</sup> The provision of multi-layered safeguards across the Armouries' activities then enables its registrar staff to strike an appropriate balance between protection and access in any given situation, whilst maintaining adequate operational contingencies. Keeping a systematic record of instrumental decision-making processes serves as a template for future initiatives and can provide an audit trail if anything were to go wrong. Overall, these strategies heavily determine the practical arrangements for the safe public use of the Armouries' weapons collections. While its registrar staff primarily coordinate this groundwork, they participate in expansive occupational networks to facilitate meaningful collections engagement.<sup>781</sup> The Armouries' registrar department routinely liaises with its curators, conservators, technicians, demonstrators, security personnel, and senior management to incorporate their complementary expertise into these processes. Together, they strive to improve the accessibility of the national collection of arms and armour for the benefit of all potential users. In this manner, the Armouries' registrar staff will surely contribute to the ongoing delivery of responsible and innovative institutional programming. The following sections suggest what might be done to support them in these efforts 'going forward'.

### **Registrar Agency**

There are certain refinements that the Armouries' registrar staff can marshal themselves to improve institutional provision of collections access to its weapons holdings. First of

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<sup>779</sup> Morse, Rex, and Richardson, p. 117.

<sup>780</sup> Anderson, p. 5.

<sup>781</sup> *Museum Professions – A European Frame of Reference*, ed. by Angelika Ruge (Paris: ICOM International Committee for the Training of Personnel, 2008), p. 18.

all, there is a compelling impulse to increase the quality and quantity of the Armouries' output. The duty to optimise public access to its weapons urges the provision of further opportunities for direct access, a wider range of displayed objects, a busier loans schedule, and greater digital content. These initiatives generally require little change in the role of the Armouries' registrar staff, instead relying on the expanded performance of their existing functions. A more ambitious public access programme entails a corresponding growth in the processes sustaining it.<sup>782</sup> In pursuit of this aspiration, the Armouries' registrar staff would be called upon more often to determine appropriate security provisions for events, to supervise the installation of exhibitions, to negotiate appropriate loan agreements, to arrange secure transportation, and to record object data. This greater undertaking would in fact encompass most of the functions set out in Figure 1, given the centrality of registrar practice to the overall operation of this system. Certain tasks have been deemed as especially urgent by the Armouries' personnel. Multiple staff members, for example, have expressed the need to fully populate its collections records as the basis for greater public usage.<sup>783</sup> Internal understanding is vital to the effective delivery of external engagement, especially given the cultural sensitivities around weapons. Some aspects of collections access can thus be improved through sustained application. These efforts to expand the Armouries' engagement strategies are achievable within existing institutional frameworks in principle, but there has to be sufficient operational capacity to meet the increased demand. Risk mitigation is resource intensive, requiring museum personnel to prioritise certain activities based on their cost-benefit analysis.<sup>784</sup> The Armouries' registrar staff make many of these tough decisions. They do not have the resources or personnel to sustain indefinite growth in the public use of its weapons collections while maintaining expected professional standards. A department of five permanent staff – a Registrar, two Assistant Registrars, a Documentation Officer, and a Documentation Assistant – can only achieve so much, even when supported by their colleagues. It will not be easy to process an increased volume of complex enquiries within these inflexible operational parameters.<sup>785</sup> Even the simpler aspects of weapons management can generate considerable difficulties at times. It may thus be necessary to moderate expectations,

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<sup>782</sup> Keene, p. 181.

<sup>783</sup> Lambert, interview, 23 February 2023, pp. 16-17; Kaines, interview, 8 February 2023, p. 22.

<sup>784</sup> Cato, 'Risk Management Overview', p. 395.

<sup>785</sup> Robson, interview, 7 February 2023, p. 16.

especially if the Armouries' government paymasters are not prepared to fund additional registrar personnel to serve its public outcomes. Internal efficiencies can only do so much to support the provision of access to restricted collections.

While the simple expansion of collections access at the Armouries encounters bureaucratic limitations, its procedural framework offers another potential area of refinement. As the guiding template of institutional practice, any changes made to individual collections procedures are assimilated into the routine exercise of weapons management. Their development is the responsibility of the Armouries' registrar department in conjunction with the Head of Collection Services, so it is within their power to rework its component parts where necessary.<sup>786</sup> In reality, this is largely a moot point. The Armouries' current procedural apparatus is overall fit for the purpose of supporting public access to its collections and requires little alteration in its details, even when it comes to the greater needs of its weapons collections. The main procedures for effective collections engagement at the Armouries – collections security, visitor access, loans out, and cataloguing – all clearly articulate the specific practical demands of contemporary weapons management. The incremental refinement of these institutional templates with regard to legal, professional, ethical, and functional developments has maintained their ongoing value to this serious work. The main contribution required from the Armouries' registrar staff is to keep its procedures updated in line with shifting operational requirements. There are few better ways of assuring a suitable balance between clarity and versatility that is perceived to characterise effective collections procedure.<sup>787</sup> This is essential for a national institution responsible for managing restricted objects across multiple sites and planes. However, there is one area where the Armouries' registrar staff acknowledge the limitations of its existing procedural framework for routine weapons management. It currently lacks any procedures that outline a standard institutional approach to digital collections access.<sup>788</sup> Its cataloguing guidance does support the provision of virtual engagement with the Armouries' objects to an extent, as it specifies the object data that is appropriate for online publication. Even so, this single provision hardly suffices to encompass the complex management requirements of digitised weapons collections. The Armouries' registrar staff are well placed to address these questions, given their ability to formulate dedicated material to

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<sup>786</sup> McKnight, interview, 22 February 2023, p. 2.

<sup>787</sup> Simmons, 'Collections Management Policies', p. 32.

<sup>788</sup> Bell, interview, 7 February 2023, p. 12.

underpin this ascendant area of museum practice. The Armouries' existing Digital Preservation Policy for archival materials offers a basic template for this work.<sup>789</sup> With suitable modification to the distinct features of its arms and armour collection, a new procedure along these lines could definitively enshrine the principles of integrity, confidentiality, and sensitivity within its routine provision of digital access. This would expedite institutional efforts to bring digital collections practice up to the high standard of weapons management expressed in the Armouries' other procedures.

Alongside reviewing current working practices, the Armouries' registrar staff will have to develop new skills if they are to continue meeting the evolving demands of weapons management. Continuing the theme of the previous paragraph, a key area of professional growth will be their digital competence. The challenges of providing public access to digital heritage have long been recognised, but museums are still working through their sizable practical ramifications.<sup>790</sup> The Armouries' registrar staff are thus labouring to establish a sound basis for virtual collections access. In particular, the major cyber-attack weathered by the Armouries in January 2022 has prompted serious reflection on the structures that underpin digital engagement.<sup>791</sup> The sensitive nature of its weapons collections has only made this process more urgent, requiring its registrar staff to systematically apply their existing functions to the digital sphere. Security is an instructive example. Maintaining the integrity of weapons collections is equally acute in both material and virtual spaces, but the latter calls for further familiarity with firewalls, data encryption, and user hierarchies. Likewise, they will need to supplement their extensive knowledge of physical storage with an awareness of file structures, cloud servers, and automatic backups. Given that these are only two of the many collections processes delivered by the Armouries' registrar staff, reorienting towards a hybrid future will be a substantial undertaking.<sup>792</sup> Mastering the intricacies of this virtual dimension of collections practice will not be easy. The Armouries' own IT personnel and the wider professional discourse both represent valuable sources of support in this endeavour. The more emergent nature of digital museum practice means authoritative information is still relatively scarce, but this situation is improving. The recent issue of dedicated guidelines for the management of digital collections will aid institutional

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<sup>789</sup> Royal Armouries, *Digital Preservation Policy* (Leeds: Royal Armouries, 2017).

<sup>790</sup> UNESCO, *Charter on the Preservation of Digital Heritage* (Paris: UNESCO, 2003), p. 2.

<sup>791</sup> Kaines, interview, 8 February 2023, pp. 19-20.

<sup>792</sup> Chapman, pp. 267-68.



attempts to formulate routine workflows.<sup>793</sup> As a current expression of best practice in this key growth area, there is good reason for the Armouries to affirm formal adherence to its terms as it has done with comparable professional frameworks. This guidance resembles other museological standards in its non-disciplinary nature, so its registrar staff would again need to apply the relevant provisions to the digital dissemination of its weapons collections. Crucially, this work has steadfast institutional backing for the foreseeable future. A major strand of the Armouries' landmark Digital Vision Project is the commitment to train an experienced 'cohort of digital operators'.<sup>794</sup> Its registrar staff could better support the needs of virtual collections access with a greater knowledge of its underlying technical infrastructure. Implementing rigorous digital procedure is especially vital for public engagement with weapons subject to marked physical constraints. It will be interesting to see how the ongoing reorientation of museums towards digital programming informs the subsequent course of registrar practice.

### **Institutional Strategies**

Of course, collections access at the Armouries is not solely the province of its registrar staff. Responsible public stewardship of its weapons collections draws on concerted interdepartmental efforts. This coordinated institutional approach is rooted in the Armouries' policy framework. While collections procedure is primarily the concern of its registrar department, the formulation of collections policy involves a wider range of staff and is ultimately approved by its Board of Trustees.<sup>795</sup> The contribution of its registrar team to this process is still significant but not predominant, reflecting the need for more varied input at this higher level. After all, the Armouries' policies are designed to provide overarching strategic direction for the realisation of its institutional duties. If collections policy is to serve this purpose effectively, it needs to be clear, relevant, comprehensive, contemporaneous, and accessible.<sup>796</sup> On the whole, the Armouries' policy framework satisfies these criteria. Following prevailing professional standards – namely MAS and BS 17820 – it affirms the broad principles governing the care, management, and use of its collections. It addresses the specific demands of its weapons

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<sup>793</sup> Digital Collections Toolkit Working Group, *Toolkit for Managing Digital Collections* (London: London Museum Documentation Network, 2023).

<sup>794</sup> Board of Trustees of the Royal Armouries, *Annual Report and Accounts 2021-22*, p. 19.

<sup>795</sup> Kaines, interview, 29 November 2021, p. 4.

<sup>796</sup> Miller, pp. 133-34.

holdings where appropriate, providing an overview of the relevant obligations for general reference. These policies are due to be updated soon, as the current documents are four years old and are thus approaching the end of their functional life.<sup>797</sup> Various developments have transformed the Armouries' operational context since their initial publication – the COVID-19 pandemic, the prominence of contested heritage, and the release of a new corporate plan. Its registrar staff will play a key role in this upcoming revision of institutional policy, given their extensive working knowledge of weapons management. Such practical insight is essential to the creation of a versatile and holistic collections strategy.<sup>798</sup> However, one aspect of the Armouries' policy structure appears to require special attention. In 2016, it created an ethics policy to articulate the core principles guiding its work. While this document does address the ethical challenges of managing a public weapons collection, it has not been updated since its creation and is not externally accessible at present.<sup>799</sup> The Armouries is under no obligation to reissue a dedicated ethics policy, as it is not a requirement of any of its regulatory frameworks. Nonetheless, it has good reason to proclaim its operational ethos as a means of assuring stakeholders of its responsible stewardship of the national collection of arms and armour. As professional exponents of ethical compliance (see Figure 1), the Armouries' registrar staff will again be central to any reappraisal of its institutional conduct. A clearer policy apparatus should serve to reinforce collective awareness of what constitutes appropriate treatment of its weapons holdings during routine practice.

If the Armouries' registrar staff are to continue fulfilling the strategic directions of its policy framework, they will need the resolute support of their colleagues. Certain innovations in operational process can be addressed more effectively at an institutional level. Interdepartmental collaboration enables the safe provision of access to weapons collections, so it follows that this is fertile ground for future development. This applies less to the working relationship between registrars and other collections staff, who are regular partners in the course of everyday museum practice.<sup>800</sup> The facilitation of access to the Armouries' weapons holdings relies on the regular collaboration of its registrar staff with most of their collections colleagues in some capacity. They cooperate with its curators to record the legal status and factual data of individual objects; they determine

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<sup>797</sup> Royal Armouries, *Collections Policy Framework*, pp. 5-6; Ambrose and Paine, p. 379.

<sup>798</sup> Simmons, 'Collections Management Policies', p. 30.

<sup>799</sup> Royal Armouries, 'Ethics Policy', pp. 5-6.

<sup>800</sup> McKeen, p. 17.

the material feasibility of using restricted collections in public programming alongside its conservators; and they call on senior collections staff to sign off routine actions and work through major complications.<sup>801</sup> There may be scope to further streamline these established interactions, but this is an incremental process of trial and error rooted in everyday practice that cannot easily be anticipated. These close relationships within the Armouries' collections department can be harnessed to develop rigorous courses of training. It is prudent to share accumulated knowledge and proven methods with emerging professionals to better guarantee the long-term future of weapons access.<sup>802</sup> While trainee registrars mainly approach weapons collections through the lens of registrar practice in substance, they would also benefit from a basic grounding in their curation and conservation to work effectively with other collections professionals. This would better equip them to mobilise the dispersed yet interdependent expertise that sustains collections management in particular and museum practice in general.<sup>803</sup> Moreover, this internal collaboration is not limited to the confines of the Armouries' collections department. There is considerable value in its registrar staff combining their efforts with a wide range of institutional personnel – including their colleagues in audience development, education, interpretation, and marketing – to negotiate the challenges of facilitating public engagement with its weapons collections. Such conversations are already starting to take place. Following the COVID-19 pandemic, the Armouries' registrar staff have registered a notable increase in interdepartmental proposals to provide further opportunities for collections access.<sup>804</sup> Active cooperation of this nature is essential to developing innovative uses of its weapons collections that still conform to the prevailing regulatory assemblage. Pooling the wide array of skills, experiences, and perspectives possessed by the Armouries' members of staff will thus help to reconcile the dissonant purposes of a custodian of public weapons collections.

Systematic institutional collaboration allows greater opportunity for innovation within the Armouries' public programming. The forms of public engagement examined in Chapter 4 are not the only ways to deliver collections access. But the pursuit of new access initiatives often engenders new challenges, especially when restricted collections are involved. Before the Armouries could instigate any new use of its weapons

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<sup>801</sup> McKnight, interview, 22 February 2023, pp. 11-12; Lambert, interview, 23 February 2023, pp. 7-8.

<sup>802</sup> Royal Armouries, *Collections Policy Framework*, p. 4.

<sup>803</sup> Marie-Agnès Gainon-Court and David Vuillaume, 'Can Museums Keep Up With a Changing World? Skills Management as a Practical Response', *Museum International*, 68.1-2 (2016), 81-96 (p. 84).

<sup>804</sup> Robson, interview, 7 February 2023, p. 7.

holdings, its registrar staff would first need to ensure that it satisfied their regulatory demands. This certainly applies to open storage, a popular trend in museums that enables greater public access to reserve collections by making their storerooms ‘visible’ and ‘visitable’.<sup>805</sup> Its adoption by the Armouries could not proceed without proper mitigation of the heightened safety and security risks of its weapons collections, but this could be achieved with careful planning. Creating a dedicated accessible store with transparent display-grade cases and drawers has been posited as a viable option.<sup>806</sup> The main challenge would then be to persuade its licensing bodies that this initiative would not weaken the wider security apparatus surrounding its weapons collections. Given the evident difficulties of physical access, the digital sphere again represents a favourable site for any diversification of the Armouries’ public programming. Greater integration of mobile devices, virtual reality, augmented reality, and haptic feedback all have the potential to transform collections access in museums.<sup>807</sup> In the Armouries’ case, these technologies could enable audiences to experience its weapons collections in more unique ways. Going beyond the factual description of these objects, hybrid approaches could help to convey their physical feel, their mechanical workings, their tactile use, or their capacity for storytelling.<sup>808</sup> But its registrar staff would still have to oversee the generation of the new data formats underpinning these efforts, as the claims of sensitivity and confidentiality would remain. The fundamental principles of weapons management cannot be set aside for any purpose. Moreover, the exploration of new forms of collections access encounters the same practical limits as the expansion of existing ones. The Armouries’ staff have an allotted amount of time and resources at their disposal, which cannot be increased at will. Greater public input is one potential approach to these inbuilt constraints. Crowdsourcing object data, for example, offers deeper engagement with collections while also benefiting institutional records and research.<sup>809</sup> But this would have to be managed carefully at the Armouries, given the additional anxieties surrounding weapons. Ultimately, there is no magic formula to determine the perfect portfolio of collections access. The Armouries’ route forward has

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<sup>805</sup> Brusius and Singh, pp. 13-14.

<sup>806</sup> Bell, interview, 7 February 2023, p. 15.

<sup>807</sup> Shannon Wellington and Gillian Oliver, ‘Reviewing the Digital Heritage Landscape: The Intersection of Digital and Museum Practice’, in *The International Handbooks of Museum Studies*, ed. by Helen Rees Leahy and Sharon Macdonald, 4 vols (Chichester: John Wiley & Sons, 2015), II: *Museum Practice*, ed. by Conal McCarthy, pp. 577-98 (pp. 577-78).

<sup>808</sup> Kaines, interview, 8 February 2023, p. 19; Lambert, interview, 23 February 2023, p. 13.

<sup>809</sup> Mia Ridge, ‘From Tagging to Theorizing: Deepening Engagement with Cultural Heritage through Crowdsourcing’, *Curator: The Museum Journal*, 56 (2013), 435-50 (p. 446).

to be shaped through informed and wide-ranging discussion guided by its institutional mission. Its registrar staff will remain key actors in this process, as those responsible for ensuring its outputs are legally, ethically, and practically viable at all times.

### **Professional Advocacy**

Even at the institutional stage, however, it is not possible to address all of the challenges of facilitating access to restricted objects. The regulatory assemblage governing the use of the Armouries' weapons holdings predominantly operates at a national level. Its constituent frameworks do have certain flaws, especially in relation to museum practice. This is the case with English weapons law, as there is substantial variation in the coherence of its distinct traditions.<sup>810</sup> While offensive weapons law is spread across many pieces of legislation, museums are almost completely exempt from its terms. Explosives law is the opposite. Its provisions are dauntingly intricate – reflecting the technical nature of the subject – but these are concentrated in just two major statutes at present (the *Health and Safety at Work etc. Act 1974* and the *Explosives Regulations 2014*). Firearms law, however, presents the greatest challenge for the Armouries and its peers. It combines technical complexity with legislative proliferation, which has led to strident calls for its simplification and consolidation.<sup>811</sup> This would aid the work of the Armouries' registrar staff by streamlining the governance of its firearms collections, but it would especially benefit other museums that do not command comparable resources or expertise. Resolving the shortcomings of these regulatory structures would establish a clearer basis for responsible weapons management. Even the official guidance issued to clarify such legal uncertainties could be improved. The Firearms Security Handbook published by the Home Office outlines a rigorous security apparatus for museums, for example, but its recommended sources for professional advice include a number of defunct bodies and roles.<sup>812</sup> This disconnect suggests there is scope for closer dialogue between government agencies, law enforcement, and museums. Together, they can work to make weapons regulation more accessible to all cultural stakeholders. As shown in Chapter 1, the Armouries is already proposing constructive refinements in the content, interpretation, and enforcement of weapons regulation to better reflect museum

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<sup>810</sup> Fortson, 'Acid, Knives, and Firearms', p. 128.

<sup>811</sup> Law Commission, pp. 48-51.

<sup>812</sup> Bell, interview, 24 March 2022, p. 1; Home Office, *Firearms Security Handbook*, p. 19.

concerns. In its capacity as a national institution, there is clear acknowledgement of its duty to advocate on behalf of the sector for regulations that permit managed access to weapons collections of cultural significance.<sup>813</sup> The Armouries is not the only museum that negotiates the competing claims of weapons management and public engagement. Its registrar staff have much to contribute to this consultative process. Not only do they routinely navigate the provisions of weapons law in the course of their duties, but they are also responsible for securing institutional licences and act as the primary contact with regulatory authorities. Their insight into the practical workings of the prevailing legal apparatus is a solid foundation for recommending informed improvements that address museum concerns. After all, they have a vested professional interest in smoothing the evident tensions between weapons regulation and public expectation.

In parallel, there are certain actions that could strengthen the museological treatment of weapons stewardship. As outlined by Chapters 2 and 3, the professional standards that govern the use and management of museum collections tangentially address the specific challenges raised by weapons at best. Their provisions are designed to be broad enough to apply to all institutions regardless of their collection type.<sup>814</sup> As such, museum staff in general and registrars in particular have to seek professional guidance on this serious subject elsewhere. One solution is to foster greater discussion about the governance and access arrangements for museum weapons collections across the registrar profession. In a sector sustained by countless overlapping networks, there is plenty of scope to develop deeper connections beyond institutional confines. It should thus be viable to institute a professional forum to facilitate the sustained appraisal of best practice in weapons management. This could harness an established body (MWG, ICOMAM, or UKRG), prompt the creation of a new group (such as a Subject Specialist Network), or develop existing informal networks.<sup>815</sup> The specific mechanism matters less than the fact that these key conversations are able to take place. The question then is how to best capture and disseminate the outcomes of this sector dialogue. There is much to recommend the publication of codified guidance for the general stewardship of museum weapons collections, which could be structured along similar lines to existing collections management handbooks.<sup>816</sup> This thesis provides much of the core material

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<sup>813</sup> Kaines, interview, 29 November 2021, p. 16.

<sup>814</sup> Ulph, 'Museums Association's Code of Ethics', p. 147; Candlin and others, p. 53.

<sup>815</sup> Bell, interview, 1 August 2022, p. 11; McKnight, interview, 22 February 2023, p. 15; Lambert, interview, 23 February 2023, pp. 9-10.

<sup>816</sup> *MRM6: Museum Registration Methods*; Matassa, *Museum Collections Management*.

for such an endeavour, but any useful primer on the subject would also have to address key areas beyond the provision of collections access. In addition to the relevant facets of registrar practice examined here – regulation, risk management, documentation, storage, security, handling, transport – it would need to cover the allied functions of acquisition, disposal, provenance, conservation, interpretation, and terminology to produce a full overview of weapons stewardship.<sup>817</sup> Any move to create authoritative guidance would thus require the participation of the diverse range of actors involved in this field. Not only would it necessitate the approval of law enforcement agencies and regulatory authorities, but also the contribution of various museum personnel including curators, conservators, and demonstrators.<sup>818</sup> Of course, the Armouries' registrar staff would also play a vital role in the development of this overdue professional guidance. Few within the sector can match the depth of their insight into the practical realities and innate frictions of presiding over a public weapons collection. Operating at the interface of museum practice and weapons management, the Armouries' registrar staff are thus uniquely empowered to pioneer innovation in both fields.

### **Weapons for All: What Next?**

Even if these assorted proposals were adopted, the management of restricted collections would remain a serious undertaking for registrars. Weapons occupy a difficult place in museum discourse. In their different manifestations – personal relics, technological showpieces, aesthetic rarities, triumphalist trophies, forensic evidence, instruments of violence – they can be encountered in countless institutional collections.<sup>819</sup> From the perspective of critical collections management, their situation is rather ambiguous. On the one hand, there is professional awareness of the heightened sensitivities surrounding museum weapons collections and the duty of care to handle their challenging legacy with delicacy. Given their strong association with conflict and violence, there will always be individuals who are not comfortable with encountering weapons in a museum setting. Certain visitors can become distressed when confronted with the stark material evidence of human conflict, while individual practitioners have questioned the propriety of showcasing pervasive tools of oppression in institutions striving to define themselves

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<sup>817</sup> Miller, pp. xii-xiii.

<sup>818</sup> Bell, interview, 24 March 2022, p. 12; Kaines, interview, 9 May 2022, pp. 18-19.

<sup>819</sup> Scott, pp. 494-97.

as safe and inclusive cultural spaces.<sup>820</sup> Few object types can elicit comparable disquiet. On the other hand, weapons continue to command considerable fascination in certain quarters. This is not just limited to a natural audience of weapon owners or users, as identified in the opening quotation of this chapter. The extensive consumption of weapons through popular culture in its various guises – namely television, films, and computer games – has served to broaden their appeal in recent times.<sup>821</sup> Public interest in weapons may be evolving, but it shows little sign of diminishing any time soon. The uneasy coexistence of these opposing perspectives provides a compelling case for the value of institutions like the Armouries, as spaces to reflect on the ambivalent human relationship with weapons.<sup>822</sup> Hence their commitment to amassing, maintaining, and disseminating weapons collections, which constitute the material basis of such work. But it is not only social perceptions that are changing, so are the objects themselves. Advances in manufacturing, particularly in the field of 3D printing, have greatly expedited the illicit production of homemade weapons.<sup>823</sup> The Armouries is already responding to this new phenomenon through its collections development programme, having acquired historic examples of 3D-printed firearms (Figure 13). But museums will also have to keenly monitor the impact of these technological developments on the overall management of their weapons holdings. The first convictions in the UK for the unlawful manufacture of prohibited firearms using a 3D printer were passed in March 2023.<sup>824</sup> While the impact of these upheavals on museum practice has been negligible so far, it seems improbable that they will remain entirely unaffected in the long run for better or worse. A substantial growth in the production of unregulated weapons would likely provoke a robust response that reconfigures the prevailing regulatory assemblage in some form. But equally, 3D printing could enable the Armouries to deliver new forms of public engagement with its collections.<sup>825</sup> Either way, registrars will have to pay close attention to the evolving nature and reception of institutional weapons collections. Their continuing relevance depends upon it.

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<sup>820</sup> Doyle, p. 106; Robson, interview, 18 July 2022, p. 1; Per B. Rekdal, 'About the Beauty of War and the Attractivity of Violence', in *Does War Belong in Museums? The Representation of Violence in Exhibitions*, ed. by Wolfgang Muchitsch (Bielefeld: Transcript Verlag, 2013), pp. 123-30 (p. 124).

<sup>821</sup> Tucker and others, pp. 764-65.

<sup>822</sup> Kaines, interview, 1 August 2022, p. 1.

<sup>823</sup> Thaddeus Talbot and Adam Skaggs, 'Regulating 3D-Printed Guns Post-Heller: Why Two Steps Are Better Than One', *Journal of Law, Medicine & Ethics*, 48.S4 (2020), 98-104 (pp. 99-100).

<sup>824</sup> BBC News, 'Men Convicted of Building Viable 3D Printed Sub-Machine Guns' (9 March 2023) <<https://www.bbc.co.uk/news/uk-england-leeds-64900210>> [accessed 17 May 2023].

<sup>825</sup> Kaines, interview, 8 February 2023, p. 21.





**Figure 13: Liberator 3D Pistol, XII.11829**

Royal Armouries, 'Centrefire Single-shot Pistol - Liberator 3D Pistol (2013)'

<<https://collections.royalarmouries.org/object/rac-object-57069.html>> [accessed 9 June 2023].

In conjunction, the management of museum weapons collections will also be shaped by shifting professional expectations. The sector is currently undergoing seismic change, spurred by a series of existential 'inequalities, injustices and environmental crises' that overshadow twenty-first-century discourse.<sup>826</sup> Registrars have to be central actors in the process of addressing these major concerns in their personal, institutional, and professional capacities. Their overall role as key mediators of museum personnel and objects allows many opportunities for action in the course of their work, even where this relationship is complicated by the presence of weapons collections. Calls for greater social inclusivity in museums, for example, have profound implications for registrar practice. The work of centring marginalised narratives – those of working-class people, people from ethnic minorities, disabled people, and LGBTQ+ people – starts with the language used to describe collections.<sup>827</sup> Hence the urgency for inclusive object records. Developing a sensitive approach to weapons documentation requires particular care, given their close association with violence, conflict, and oppression. One means of

<sup>826</sup> *Museum Activism*, ed. by Robert R. Janes and Richard Sandell (Abingdon: Routledge, 2019), p. xxvii.

<sup>827</sup> Kathleen Lawther, 'Documentation as a Site for Critical Decolonial and Anti-Racist Work', in *Doing the Work: Embedding Anti-Racism and Decolonisation into Museum Practice*, ed. by Anjalie Dalal-Clayton and Ilaria Puri Purini (London: Contemporary Art Society, 2022), pp. 56-69 (p. 58).

nurturing inclusive practice is to facilitate sustained community participation in the ‘internal’ workings of museums. Realigning processes and behaviours to this end gives the public greater authority to shape museum activities, even ceding them agency to perform collections management processes in certain cases.<sup>828</sup> Given the prominence of co-curation, co-creation, and co-production, the concept of ‘co-management’ should be easy to understand – if rather more difficult to implement. Genuine democratisation of the stewardship of weapons collections, however, would only be able to proceed with great caution on account of the numerous prohibitions on their use. Then there is the climate crisis, which overlays and amplifies these other concerns. The high amount of materials and energy consumed by the care, storage, transport, and display of museum objects needs urgent attention if this footprint is to be reduced to viable levels.<sup>829</sup> The extra measures required to mitigate the safety and security threats posed by weapons only exacerbate the already formidable task of attaining environmental sustainability. In light of these demanding issues, a model of registrar practice based on the principles of equality, openness, and efficiency is more pressing than ever. Registrars are clearly aware that these ongoing transformations will profoundly influence their role in the provision of collections access, even if its future course is difficult to anticipate.<sup>830</sup> It will take all their expertise to make the necessary changes while maintaining the fine balance of safety, security, and access that defines the delivery of effective weapons management. Fostering meaningful public engagement with restricted collections in a rapidly evolving cultural landscape is a serious feat and will most likely remain so.

Overall, the challenges awaiting the Armouries’ registrar staff and their peers epitomise the core theme of this thesis – the dissonance of weapon management and museum practice. Short of a dramatic overhaul in one or both of these fields, their frictions will continue to burden future practitioners. The application of assemblage theory to this operational intersection has highlighted the wide range of actors that shape this process.<sup>831</sup> Museum personnel of many kinds, public audiences, professional bodies, regulatory authorities, political agencies, legislative provisions, museological standards, ethical values, institutional policy, departmental procedure, documentation

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<sup>828</sup> Helena Robinson, ‘Curating Good Participants? Audiences, Democracy and Authority in the Contemporary Museum’, *Museum Management and Curatorship*, 35 (2020), 470-87 (pp. 478-79).

<sup>829</sup> Lea Foster Warden, Sara Franz, and Toni M. Kiser, ‘Registrars and Sustainability’, in *MRM6: Museum Registration Methods*, ed. by John E. Simmons and Toni M. Kiser, 6th edn (Lanham: Rowman & Littlefield, 2020), pp. 433-43 (p. 441).

<sup>830</sup> Robson, interview, 7 February 2023, pp. 14-15.

<sup>831</sup> Bennett and Healy, p. 4.

terminology, technological frameworks, the nature of the actual weapons – all exert a distinct impact on public engagement with these restricted objects. This multiplicity of agents will hardly diminish as long as the current demands of weapons management persist. The intense public scrutiny aroused by recent high-profile lapses in collections procedure has only raised the stakes for museum personnel.<sup>832</sup> The role of registrar staff in coordinating these interwoven variables in pursuit of greater public access is more critical than ever. In this context, a question first posed over thirty years ago remains pertinent to modern notions of critical collections management: ‘If museum work is changing, how does the museums profession need to change?’<sup>833</sup> With reference to the future provision of collections access, greater dialogue is one answer. The example of the Armouries’ registrar staff has shown the value of cultivating inter-departmental, inter-institutional, and inter-professional networks to realise public engagement with its weapons collections. In parallel, individual practitioners will need to diversify their expertise to keep up with the shifting demands of routine practice. The effective delivery of a risk-managed approach relies on registrar staff being equipped with the skills to identify, assess, and respond to new developments at short notice. Museums will struggle to serve the needs of current and future generations without the active pursuit of ‘risk control, polyvalence and adaptability’ by their registrars.<sup>834</sup> This applies throughout the profession, but especially to the custodians of weapons collections. For the mounting pressures on museum operations will hardly simplify the laborious process of preparing hazardous, harmful, or sensitive objects for public use. The Armouries’ registrar staff are set to be occupied with this vital work for the foreseeable future. Museums generally operate on the assumption that they will provide access to their collections in perpetuity, even if these remain subject to heavy controls. Forging connections between people and objects is central to their very existence.<sup>835</sup> A museum without visitors is effectively a warehouse. A museum without objects is effectively a diorama. The integral purpose of museums is to effect the convergence of the two – a process in which registrars will surely continue to play an indispensable role.

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<sup>832</sup> Museums Association, ‘Our Statement on Theft in Museums’ <<https://www.museumsassociation.org/our-statement-on-theft-from-museums/>> [accessed 31 August 2023].

<sup>833</sup> Gaynor Kavanagh, ‘The Museum Profession and the Articulation of Professional Self-Consciousness’, in *The Museums Profession: Internal and External Relations*, ed. by Gaynor Kavanagh (Leicester: Leicester University Press, 1991), pp. 37-55 (p. 52).

<sup>834</sup> Vassal and Daynes-Diallo, p. 69.

<sup>835</sup> Mason, Robinson, and Coffield, pp. 18-19.

## Appendix: Chronological Summary of English Weapons Law

This appendix provides an overview of weapons law currently in force in England and Wales that most heavily impacts the work of museums. For clarity, this has been split into three separate tables corresponding to its major traditions of offensive weapons law, firearms law, and explosives law. Individual pieces of legislation are first assigned to the appropriate category and are then arranged chronologically within each table. To keep this appendix a manageable length, only the provisions that directly pertain to museum practice are listed. Where a single statute contributes to more than one of the legislative traditions, it is given separate entries in each of the relevant tables and its constituent provisions are distributed accordingly. The scope of this summary is limited to clarifying the main regulations examined in the course of the thesis, so it does not attempt to recount the full complexities of weapons law. As such, it should neither be regarded as providing an exhaustive treatment of any individual statute nor a definitive statement of a museum's legal duties with respect to its weapons collections. If any doubt arises, consult the original legislation and/or seek independent legal advice.

### Offensive Weapons Legislation

<i>Prevention of Crime Act 1953</i>	<ul style="list-style-type: none"> <li>• Introduces the offence of carrying an offensive weapon in public place without reasonable excuse.</li> </ul>
<i>Restriction of Offensive Weapons Act 1959</i>	<ul style="list-style-type: none"> <li>• Introduces the offences of manufacturing, importing, selling, hiring, giving, and offering a flick knife or gravity knife to another person.</li> </ul>
<i>Crossbows Act 1987</i>	<ul style="list-style-type: none"> <li>• Introduces the offence of under 17s possessing crossbows without adult supervision.</li> </ul>
<i>Criminal Justice Act 1988</i>	<ul style="list-style-type: none"> <li>• Introduces the offence of carrying most bladed or pointed articles in public, subject to good reason.</li> <li>• Introduces the offences of manufacturing, selling, hiring, giving, offering, and possessing for sale or hire certain specified weapons, exempting when they are made available for museum purposes.</li> <li>• Introduces the offence of importing the specified weapons in the previous point.</li> </ul>
<i>The Criminal Justice Act 1988 (Offensive Weapons) Order 1988</i>	<ul style="list-style-type: none"> <li>• Extends weapons specified in the 1988 Act to include knuckledusters, swordsticks, belt buckle knives, push daggers, butterfly knives, telescopic truncheons, blowpipes, and a series of martial arts weapons.</li> </ul>
<i>Knives Act 1997</i>	<ul style="list-style-type: none"> <li>• Introduces the offences of marketing and indicating through publication knives as suitable for combat or encouraging violent behaviour using them.</li> </ul>

<i>The Criminal Justice Act 1988 (Offensive Weapons) Order 2002</i>	<ul style="list-style-type: none"> <li>• Extends weapons specified in the 1988 Act to include disguised knives.</li> </ul>
<i>The Criminal Justice Act 1988 (Offensive Weapons) Order 2004</i>	<ul style="list-style-type: none"> <li>• Extends weapons specified in the 1988 Act to include stealth knives and fixed truncheons.</li> </ul>
<i>Violent Crime Reduction Act 2006</i>	<ul style="list-style-type: none"> <li>• Amends 1987 Act to forbid possession of crossbows by under 18s without adult supervision.</li> </ul>
<i>The Criminal Justice Act 1988 (Offensive Weapons) Order 2008</i>	<ul style="list-style-type: none"> <li>• Extends weapons specified in the 1988 Act to include curved swords with blades of over 50cm.</li> </ul>
<i>The Criminal Justice Act 1988 (Offensive Weapons) Order 2016</i>	<ul style="list-style-type: none"> <li>• Extends weapons specified in the 1988 Act to include zombie knives.</li> </ul>
<i>Offensive Weapons Act 2019</i>	<ul style="list-style-type: none"> <li>• Introduces the offences for the private possession of flick knives, gravity knives, and the weapons specified in the Orders to the 1988 Act.</li> <li>• Amends 1959 and 1988 Acts to exempt museum workers from all prohibitions (except import) on flick knives, gravity knives, and the weapons specified in the Orders to the 1988 Act.</li> <li>• Extends weapons specified in the 1988 Act to include cyclone knives.</li> </ul>

### **Firearms Legislation**

<i>Firearms Act 1968</i>	<ul style="list-style-type: none"> <li>• Introduces offences of acquiring or possessing Section 1 firearms or ammunition without a certificate.</li> <li>• Defines Section 1 firearms as all firearms except shotguns and air weapons.</li> <li>• Introduces offences of acquiring or possessing shotguns without a certificate (Section 2).</li> <li>• Introduces offences of possessing, acquiring, manufacturing, or transferring prohibited weapons and ammunition without special authority.</li> <li>• Defines prohibited weapons and ammunition as automatic firearms, weapons discharging noxious substances, or noxious ammunition (Section 5).</li> <li>• Introduces prohibitions on the possession of firearms for convicted offenders (3-36 months for 5 years, 36+ months indefinitely).</li> <li>• Introduces offences of transferring, repairing, testing, or proving firearms and ammunition for prohibited persons.</li> <li>• Introduces offences for under 14s to possess firearms or their ammunition, and to possess air weapons or their ammunition.</li> <li>• Introduces offence for under 15s to possess a shotgun without adult supervision.</li> <li>• Introduces offences of gifting, lending, or giving Section 1 firearms or ammunition to under 14s.</li> </ul>
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<i>Firearms Act 1968</i>	<ul style="list-style-type: none"> <li>• Introduces offence of gifting shotguns or their ammunition to under 15s.</li> <li>• Introduces offences of gifting or giving air weapons or ammunition to under 14s.</li> <li>• Introduces offences of selling, transferring, repairing, proving, or testing any firearms or ammunition to anyone drunk or of unsound mind.</li> <li>• Defines firearms as lethal barrelled weapons that discharge missiles including prohibited weapons, lethal or prohibited weapon components, and silencers, suppressors, or flash reducers.</li> <li>• Defines ammunition as firearm rounds, grenades, bombs, and other missiles.</li> <li>• Exempts antique firearms transferred, acquired, or possessed as curiosity or ornament from all provisions.</li> </ul>
<i>The Firearms (Dangerous Air Weapons) Rules 1969</i>	<ul style="list-style-type: none"> <li>• Classes air weapons with high proportional kinetic energy as Section 1 firearms.</li> </ul>
<i>Firearms Act 1982</i>	<ul style="list-style-type: none"> <li>• Classes imitation firearms as Section 1 firearms if they look like a Section 1 firearm and can be readily converted without specialist skills and equipment.</li> </ul>
<i>Firearms (Amendment) Act 1988</i>	<ul style="list-style-type: none"> <li>• Extends prohibited Section 5 weapons to include burst-fire firearms, most self-loading and pump-action rifles, most self-loading or pump-action shotguns, most smooth-bore revolvers, most rocket launchers or mortars, and explosive missiles fired from a firearm.</li> <li>• Outlines requirements for deactivated firearms, such as an approved proof mark and written documentation.</li> <li>• Museums can apply to the Secretary of State to receive a Museum Firearms Licence to possess firearms and ammunition without individual licences, with a separate provision for Section 5 prohibited firearms.</li> <li>• Museum firearms licenses only granted if local police are satisfied that exhibiting and storing weapons collection won't endanger public safety and must be renewed every five years.</li> <li>• Museum firearms licences can be revoked following the failure of a police inspection, conviction for false application, or failure to observe the licence terms.</li> <li>• Established fees for granting, renewing, extending, or amending a Museum Firearms Licence.</li> <li>• Names general criteria and specific institutions with eligibility to apply for a Museum Firearms Licence.</li> </ul>
<i>The Firearms Acts (Amendment) Regulations 1992</i>	<ul style="list-style-type: none"> <li>• Extends prohibited Section 5 weapons to include disguised firearms, explosive military missiles, rocket or missile launchers, igniting military missiles, armour-piercing ammunition, expanding pistol ammunition, and any other unregulated missiles.</li> </ul>
<i>The Firearms (Dangerous Air Weapons) (Amendment) Rules 1993</i>	<ul style="list-style-type: none"> <li>• Classes all disguised air weapons as Section 1 firearms.</li> </ul>

<i>Firearms (Amendment) Act 1997</i>	<ul style="list-style-type: none"> <li>• Extends prohibited Section 5 weapons to include high-calibre handguns (above .22 rimfire cartridges).</li> <li>• Classes handguns within a collection as Section 1 Firearms if they are manufactured before 1919 and their ammunition is not readily available.</li> <li>• Classes handguns of rarity, aesthetic quality, technical interest, or historical importance as Section 1 firearms.</li> <li>• Provides for the surrender of newly prohibited firearms and ammunition to the police.</li> </ul>
<i>Firearms (Amendment) (No. 2) Act 1997</i>	<ul style="list-style-type: none"> <li>• Extends prohibited Section 5 weapons to include small-calibre handguns.</li> <li>• Provides for the surrender of newly prohibited firearms and ammunition to the police.</li> </ul>
<i>The Firearms (Amendment) Act 1997 (Firearms of Historic Interest) Order 1997</i>	<ul style="list-style-type: none"> <li>• Specifies a list of readily available handgun calibres for the purpose of the 1997 Act.</li> </ul>
<i>The Firearms (Museums) Order 1997</i>	<ul style="list-style-type: none"> <li>• Specifies museums eligible to apply for a Museum Firearms Licence as those fully registered with the Museums and Galleries Commission</li> </ul>
<i>Anti-social Behaviour Act 2003</i>	<ul style="list-style-type: none"> <li>• Amends 1968 Act to forbid possession of air weapons and ammunition by under 17s.</li> <li>• Amends 1968 Act to make gifting or supplying air weapons or ammunition to under 17s an offence.</li> <li>• Extends prohibited Section 5 weapons to include air weapons with self-contained gas cartridge systems.</li> </ul>
<i>Violent Crime Reduction Act 2006</i>	<ul style="list-style-type: none"> <li>• Amends 1968 Act to forbid possession of air weapons and ammunition by under 18s.</li> <li>• Amends 1968 Act to make gifting or supplying air weapons or ammunition to under 18s an offence.</li> <li>• Introduces offences of manufacturing, modifying, selling, or importing unlawful and realistic imitation firearms, except when done for museum purposes.</li> </ul>
<i>Anti-social Behaviour, Crime and Policing Act 2014</i>	<ul style="list-style-type: none"> <li>• Amends 1968 Act to prohibit those receiving suspended sentences from possessing firearms.</li> <li>• Amends 1968 Act to introduce offences of possessing for sale or transfer, and acquiring for sale or transfer, prohibited weapons without special authority.</li> </ul>
<i>Policing and Crime Act 2017</i>	<ul style="list-style-type: none"> <li>• Amends 1968 Act to define a lethal barrelled weapon as one that fires missiles with energy above 1 joule.</li> <li>• Amends 1968 Act to define firearms components as variations on barrels, frames, and pressure containers.</li> <li>• Amends 1968 Act to exclude most airsoft guns from the legal definition of firearms.</li> <li>• Provides criteria for defining an antique firearm, based on date of manufacture, cartridge type, and propulsion.</li> <li>• Introduces offences of gifting, selling, and making available for sale or gift defectively deactivated weapons (transfers between licensed museums of any firearm deactivated before April 2016 are exempt).</li> </ul>

<i>Offensive Weapons Act 2019</i>	<ul style="list-style-type: none"> <li>• Extends prohibited Section 5 weapons to include rapid-firing rifles with lever release action or gas propellant release systems, and bump stocks.</li> <li>• Provides for the surrender of newly prohibited firearms and ancillary equipment to the police.</li> </ul>
<i>The Firearms Regulations 2019</i>	<ul style="list-style-type: none"> <li>• Introduces offence to transfer a deactivated firearm unless notice is given to the appropriate authority.</li> </ul>
<i>The Antique Firearms Regulations 2021</i>	<ul style="list-style-type: none"> <li>• Defines the list of obsolete calibres for the purpose of identifying antique firearms.</li> <li>• Defines antique firearms as possessing one of the following propulsion systems: muzzle-loading, breech-loading not using rim-fire or centrefire, most breach-loading rim-fire, and air weapon propulsion.</li> <li>• Defines antique firearms as being manufactured before 1 September 1939.</li> </ul>

### Explosives Legislation

<i>Explosive Substances Act 1883</i>	<ul style="list-style-type: none"> <li>• Introduces the offence of maliciously causing an explosion likely to endanger life or property.</li> <li>• Introduces the offences of maliciously intending or conspiring to cause explosion likely to endanger life or property and making or possessing explosive substances with the intent to enable an explosion likely to endanger life or property.</li> <li>• Introduces the offences of making or possessing any explosive substance under suspicious circumstances unless a lawful object can be proved.</li> </ul>
<i>Health and Safety at Work etc. Act 1974</i>	<ul style="list-style-type: none"> <li>• Establishes the keeping and use of explosive, flammable, and dangerous substances as a primary subject of occupational safety law.</li> <li>• Establishes duty of employers to protect employees and others from health and safety risks, including those presented by explosives.</li> <li>• Establishes duty of employees to maintain health and safety and cooperate with employer requirements, including with respect to explosives.</li> <li>• Establishes the principle that no person shall intentionally interfere with or misuse anything provided for workplace health, safety, or welfare, including in relation to explosives.</li> <li>• Establishes the principles that employers should not charge employees for health and safety provisions.</li> <li>• Introduces offences to fail in discharging health and safety duties with respect to explosives, and to contravene any relevant regulations or prohibitions.</li> <li>• Introduces offences to obstruct inspections by the Health and Safety Executive or falsify any documentation required to meet statutory provisions.</li> </ul>



<p><i>Explosives Regulations 2014</i></p>	<ul style="list-style-type: none"><li>• Establishes that an explosives certificate is required for acquiring and keeping most explosives, issued after inspection by the local police authority.</li><li>• Establishes that an explosives licence is required to manufacture and/or store most explosives, but this does not apply to the storage of less than 10kg of shooters' powder or 15kg of small arms ammunition.</li><li>• Establishes that an explosives licence is renewable for 5 years and subject to any conditions imposed by the relevant licensing authority, following the inspection of the applicant and the proposed site.</li><li>• Establishes the requirement of obtaining a competent authority document from HSE before transferring any civil explosive.</li><li>• Establishes that anyone storing, keeping, or manufacturing explosives must observe the following stipulations: prevent and limit destructive effects of explosives, ensure relevant separation distances, dispose of substances safely, prevent unauthorised persons from accessing sites or explosives, only transfer explosives to another licensed body, and not employ prohibited persons to handle explosives.</li><li>• Establishes requirements as to the marking of civil explosives with a unique identification, keeping record of explosives, and reporting losses of explosives.</li><li>• Introduces prohibition of possessing, transferring, or importing unmarked plastic explosives.</li></ul>
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