Draft Registration Standard for the New Registration Scheme

Response of the Scottish Museums Council

1   SMC's approach to quality and continuous improvement

1.1   SMC's aim is to improve museum and gallery provision in Scotland for both local people and visitors. One of the key ways in which we do this is by enabling museums to develop their potential by promoting good management, high professional standards and the effective use of resources. We use standards schemes as a means of achieving our aims.

1.2   SMC's recent response to the Scottish Executive's consultation on an Action Plan for Museums has argued that increased funding for museums should be linked to quality assurance schemes, but recognises there is a job to be done in developing a robust standards framework for museums, which can allow benchmarking of comparative services, enable continuous improvement and reward excellence. SMC's own grants programmes are currently only available to registered museums.

1.3   SMC's work with partner agencies, including as expert advisers to HLF, has emphasised the importance of standards schemes in driving up the quality of museum provision. We also have direct experience of other standards schemes. For example, SMC contributes to VisitScotland's Visitor Attractions Grading Scheme (VAGS) overseeing panel, and SMC works to the Investors in People standard, which it has maintained since 1999. Looking at the wider Scottish context, Vocal (the Scottish Association of Directors of Leisure) identified quality and continuous improvement as one of their key priorities in their submission to Executive Ministers prior to the May 2003 elections.

1.4   SMC has administered Phases 1 and 2 of the UK Registration scheme in Scotland since 1990. In this role, we assess all non-national museum applications and advise applicants on the benefits of Registration and the content and process of Registration applications. SMC believes that standards have a key role to play in improving the quality of management and service delivery in Scottish museums.

1.5   SMC has been actively involved in the development of the draft Registration Standard, through participation in Resource's working group meetings and by hosting Resource's consultation in Scotland. The following response, therefore, repeats points SMC has made throughout the development process to date, and which we hope will be considered before the scheme is finalised.

1.6   The importance of an effective Registration scheme for museums in Scotland cannot be over-stated. We recognise the benefits the scheme to date has brought to individual museums and to improving performance through the sector. The new scheme presents a significant opportunity for future development of the museum sector in the UK, and it is important that we get it right. It has the potential to recognise and drive up quality in museums, assist national and local funding decisions, and provide an effective tool for self-development for museum organisations at whatever level.

1.7   In SMC's view, it will be important to incorporate the changes and recommendations suggested in our response if the new Registration scheme is to achieve its potential.

2.   A minimum standard scheme

2.1   The main declared aim of the "Draft Registration Standard" is to identify and encourage achievement of a minimum level of performance in museums. SMC supports the need to define a baseline or threshold for acceptable museum performance, and agrees that once established this baseline should become the entry point for all applicants.   For both museum and assessor, there is considerable value in establishing a definitive and realistic baseline which will preclude extensive revision of the scheme in the future through further phasing.

2.2   We support the aim that the scheme is as inclusive as possible, enabling new and aspiring museums to attain registered status alongside the largest national museums. However, SMC is not yet convinced that the baseline as defined in the draft Registration Standard has been set at the appropriate level to be the definitive threshold of museum performance. The threshold has been raised in collections areas and we have an immediate concern that Scottish museums will be disadvantaged by the scheme, since they have not benefited from the investment available to English museums through designation challenge funding and other sources in recent years. At worst, a number of Scottish museums with significant collections will become ineligible for registered status.

2.3   SMC would argue that it is important to strike a balance between a need to drive up standards in areas of museum performance and the need for an inclusive scheme which continues to provide avenues to funding and advice to those who operate near or at the baseline. If the minimum entry point is too idealistic, then routes to improvement will be blocked.

2.4   The importance of setting the threshold at the appropriate level is particularly important if, as is still to be decided, the Registration scheme no longer awards provisional status and if Resource aim to add levels to the scheme in the future.

3.   Beyond the Minimum Standard

3.1   During the development of the draft scheme, Resource considered and rejected the value of making the scheme more than a minimum standards scheme by incorporating levels up to and including excellence. In Scotland, feedback to SMC has been positive on the standards framework within the National Audit, which allowed museums to demonstrate levels of need, as well as celebrate achievements above the baseline. We believe levels are important in developing capacity and encouraging continuous improvement in museums within a structured framework.

3.2 Local authority museums would benefit from being able to show levels of performance, allowing them to demonstrate Best Value and improvement over time, and to benchmark against other services. For independent museums, it is just as important to indicate excellence particularly when they operate within the wider tourism arena. If Registration were a scheme which included levels of performance it would be easier for Resource to promote it as a visible and recognised public mark of museum quality. As a comparison, visitors are already familiar with VisitScotland's Visitor Attraction Grading Scheme, which measures visitor experience and front of house facilities against a five star grading system.

3.3 We believe that measuring levels of performance would bring Registration in line with other performance management schemes and would benefit museums competing for funds and visitors.

4. One Size Fits All?

4.1 SMC continues to believe that a scheme that has only a small number of core mandatory requirements with modules for developmental or specialist areas is more suited to the Scottish museum landscape than a 'one size fits all' scheme. This would allow a wider range of heritage bodies to participate and to be measured against criteria appropriate to each institution. For example, a modular scheme would better accommodate the growth in electronic users of museum services and would therefore be an improved fit for many university collections. Modules would suit heritage groups with good public facilities that wish to borrow rather than own collections. Modules could also provide the flexibility Registration needs to embrace collection-holding historic houses, ships and working museums, some of which encountered problems when complying with Phase 2 eligibility.

4.2 Moreover, we are concerned that the combination of a non-modular scheme, with ownership of collections as the main eligibility criteria, will continue to encourage the establishment of new independent museums, eager for access to the funding that Registered status can unlock. In Scotland, we have twice the number of visitor attractions per capita than England and Wales, and in recent times have sought to encourage sustainable forms of heritage development, including alternatives to collections ownership (ref. *Big Questions, Big Answers*, a guide to issues surrounding heritage development, SMC, May 2002).

5. Continuous improvement

5.1 Continuous improvement is one of the recognised strengths of the existing Registration scheme and SMC supports the principle of a developmental component in the new scheme. However, we are disappointed that the developmental function continues to be mixed in with the mandatory requirements. We believe that separation of the functions of quality assurance/measurement from the encouragement of improved performance will result in a more streamlined application and assessment process, more distinct roles for advisers and assessors, and an enhanced profile of the scheme with the public.

5.2 The proposal to measure continuous improvement using the museums' own forward plans is welcomed by SMC, but we are concerned that the draft scheme currently lacks any criteria against which to measure the plans. Externally verified benchmarks, as currently used in public library standards, could provide the necessary mechanism for assessment. Benchmarks would significantly strengthen the new scheme by providing the framework for continuous improvement to

complement the framework for meeting the baseline. They would be especially helpful for museums in large organisations where forward plans are governed by needs and priorities that are not necessarily a close correlation to Resource's. We also recommend that, to avoid confusion, any developmental guidance should be published separately from application guidance.

6. The Content of the Standard

6.1 The content of the Draft Registration Standard represents a significant step forward in acknowledging the full extent of the museum role. In particular, we warmly welcome the intention to assess a museum's learning and access provision. SMC has also received feedback from member museums which are pleased that their efforts and work in this area will be recognised in the scheme.

6.2 SMC also welcomes the inclusion of new areas of collections work for assessment in the draft scheme. In particular, collections care, where, although information was gathered by Resource, there was little actual assessment under Phase 2.

6.3 We would encourage Resource to identify specific, measurable criteria in each new area of activity that can be introduced without overburdening the applicants with paperwork and without raising the baseline beyond realistic levels. We single out the raised thresholds for documentation backlogs and for collections care as needing careful scrutiny when the results of the English and Welsh pilots are assessed and for the difference in past funding for core collections in Scotland to be taken into account.

6.4 Although we do not know precisely how many museums have documentation backlogs that will take more than 5 years to clear, we do know that 50% of Registered museums in Scotland have backlogs of over 5,000 items, and 37.5% have backlogs of over 10,000 items (National Audit, May 2001). Many of these museums have larger or more significant collections.

6.5 Under Phase 2, the collections care section contained no absolute standards against which assessment criteria could be applied. The introduction in the new scheme of compliance with the basic level in *Benchmarks in Collections Care* is a big step up for many applicants requiring lead-in time, professional advice, and extra resources. For some this may be impossibility. The National Audit showed a large number of Scottish museums not meeting basic practice in areas of collections care. For example, 54% of museums in Scotland scored below basic on conservation of their collections, 57% scored below basic on disaster planning, 77% (including 23 out of 30 local authorities) scored below basic on storage.

6.6 SMC suggests that, to ensure that the baseline remains realistic, a number of core criteria for collections care and for access and learning should be picked out of the existing self-assessment materials, *Benchmarks for Collections Care* and *Inspiring Learning*, in the same way that eight core documentation criteria have been identified in SPECTRUM for the purposes of Registration.

6.7 In relation to learning, the draft standard helpfully indicates that learning is a core museum activity and that the checklist available as part of the Inspiring Learning framework must be used to assess services currently provided. The content of the checklist, not yet available, will therefore be critical to the successful implementation of this aspect of the standard. SMC has worked with Resource on the potential delivery and implementation of Inspiring Learning in Scotland. We

would support the need for further information/ workshops to raise awareness of IL and how it might be used in Scottish museums both to improve museums' performance in this area, and enable museums to meet new registration criteria.

6.8   In a number of areas, including user engagement and learning, it would be helpful to clarify what constitutes the minimum requirement. Is it simply completion of a checklist, even if many areas require further development?

7.   Presentation and Administration of the Standard

7.1   Resource's *Process Review of the Museum Registration Scheme Phase 2* conducted by Rosemary Ewles and Adrian Babbidge and published in June 2000 was an excellent and incisive review of the Phase 2 Registration assessment process. The review aimed to improve consistency, speed and efficiency of assessment. It led to improved guidance for assessors and a more transparent and efficient assessment process. This, in part, assisted SMC to complete two thirds of all assessments in just over two years, where it had previously taken four and a half years to complete one third.

7.2   SMC would argue that Resource needs to implement the recommendations of the *Process Review* in relation to the new draft standard, to ensure that the scheme is operationally efficient and presenting good value for money. In particular, the *Process Review* went a long way towards improving the measurability of criteria in Phase 2, but the proposed new scheme includes requirements that are not measurable, for example, in the areas of orientation and signage; sound financial basis; opening hours; visitor facilities; staffing adequacy; staff development.

7.3   Layout of the Draft Registration Standard could be improved to make the information significantly more accessible. For example, Resource could present the guidance for applicants in a tabular format, extending each table to cover evidence required and indicators, following the excellent examples of *Inspiring Learning* and the Phase 2 assessors' desk instructions. Clearly laid out, detailed criteria would enhance the understanding of the scheme by others, including governing bodies, funders and the public.

7.4   In addition, advice on what 'should' be done to develop above the baseline should be presented separately from assessment criteria that 'must' be met to achieve Registration. As stated earlier (paragraph 5.2), we would welcome separate guidance for using the scheme for development and for demonstrating compliance. We also think it would be helpful to have overview information about the purpose and background of the scheme published separately from guidance to applicants.

7.5   The current proposals will require a considerable increase in advice activity, both from bodies like SMC that deliver the scheme, and from curatorial advisers. With the setting up of the hubs in England, Resource are proposing to separate Registration advice from assessment. For this to operate efficiently Resource will need to be extremely clear about the respective roles of advisers and assessors and clear printed guidance will become even more important. SMC would also suggest that Resource produces guidance for advisers and assessors that only differs from that for applicants in having an additional level of interpretive detail for each role. This would improve the efficiency, accountability and transparency of the scheme.

7.6 SMC welcomes the recognition from Resource that Phase 2 Registration generated too much paperwork, and would strongly support the need for a streamlined application and assessment process. Electronic submission of applications and assessments, and allowing multi-site services to negotiate single applications would be excellent first steps. However, we would also argue that an effective knowledge management strategy, which takes account of the wider information needs and context of museums, should underpin the collection of all information for Registration purposes. Information should be held in database form, and updated electronically. A further efficiency would be if the new scheme could build on information collected in Phase 2. In this way, museums would be required to update rather than re-submit information.

7.7 It is unclear from the draft Registration Standard which information Resource seeks to collect for context and information only, and which information represents evidence for assessment. Ideally, Resource should not collect information superfluous to assessment, which duplicates activity at local and Scottish national level. We have strongly recommended to both the Scottish Executive and Resource that there should be consideration of basic national statistical requirements. Where Resource collects information beyond what is needed to assess compliance with Registration, it should be made clear what the reasons for this are. In terms of future re-assessments, it would significantly streamline the process if applicants only have to submit information that has changed instead of having to resubmit everything.

7.8 SMC would welcome some refinement of the terminology used in the Draft Registration Standard. While the glossary of terms is helpful, terms are not always used consistently in the document. We are not sure that 'Registration Standard' is the right name for a minimum standard scheme that excludes levels of performance or benchmarks for development above the minimum.

7.9 The Registration scheme dates from a time when few standards schemes existed. In recent years a cross-sectoral terminology has emerged for quality assurance schemes and development tools. SMC suggests Resource should now place Registration firmly in the wider context of standards schemes and gain recognition of the scheme as a mark of quality assurance.

7.10 The costs of delivery of the scheme are not born by Resource in Scotland and we would strongly welcome a scheme which is more efficient for applicants, advisers and assessors so that SMC might deliver it without detriment to its remit to develop capacity and drive forward improvement above the minimum standard in Scottish museums. We believe that there are many efficiency savings that could be made in the administration of the scheme by improving layout, language and consistency of the written guidance; by building on the strengths of the Process Review and by drawing a clear distinction between the dual functions of improving quality and measuring performance.

8. Conclusion

8.1 SMC has given detailed response to the Draft Registration Standard as a reflection of the importance and value we place on the scheme. Whilst highlighting our concerns about the draft we have tried to make as many constructive suggestions for improvement as possible.

8.2   We support the principal of a minimum entry level to make the scheme accessible to all museums but have expressed concern that some of the proposed criteria do not reflect a realistic baseline for museums. This may have a particular effect in Scotland where museums have had less access to challenge funding and where we have a higher proportion of volunteer-run museums than other parts of the UK. We are not sure if Resource has considered the full impact of this and would urge them to ensure that the entry point is achievable. This is also crucial if, in line with most other quality assurance schemes, the scheme is later updated to include levels above the basic.

8.3   Although we accept that levels of performance will not be included in the scheme from the start, we believe that the sector may increasingly see the need for this as time goes on. Therefore, to avoid a further complete re-design of Registration in the future, it is crucial that the baseline is set at the appropriate level from the start.

8.4   We are disappointed that the eligibility criteria for the draft new Registration scheme have retained the 'one size fits all' principle. We believe that this encourages the creation of new museums by organisations drawn to Registration by the promise of funding. In the current funding climate, we feel a modular, more flexible scheme could have provided alternative development models for these organisations. Has this implication of the decision not to create a modular scheme been fully considered? Does Resource really want to encourage the development of more museums in today's climate?

8.5   A clearer separation of the developmental and mandatory aspects of the scheme is necessary. This is particularly important as advice and assessment begin to be carried out by different bodies in the English regions, in Wales, Scotland and Northern Ireland.

8.6   We welcome the measurement of two important museum functions into the scheme for the first time: collections care and learning and access. We urge Resource to employ a consistent approach to the use of self-assessment tools. Following the model of the documentation criteria where core criteria have been picked from SPECTRUM, core criteria should be taken from *Benchmarks in Collections Care* and *Inspiring Learning* to provide the requirements in these two sections.

8.7   We believe the scheme needs to be presented in a clear tabular format using accepted standards terminology to give it the transparency and simplicity needed to make operation of the scheme as efficient and cost effective as possible. This is a matter of re-design and clarification of language rather than a major re-working of the scheme.

SMC
11 June 2003