

British Museum Independent Collection Security Review

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Recommendations

A. The Collection

1. The Museum should have a policy which defines what comprises its Collection.
2. The Museum should identify the unregistered or inadequately registered objects within the Collection and register them fully.
3. The Museum should introduce a policy regulating how registration should be undertaken – what information and in what detail artefacts should be registered (including, for example when bulk registration is acceptable). It should consider requiring mandatory entry fields to ensure its cataloguing quality. This policy should require newly acquired objects to be registered promptly.
4. The Museum should improve its policy for reporting unlocated objects to cover the entire Collection, to allocate responsibilities for investigating unlocated objects and to accelerate escalation of the problem.
5. The Museum should improve the protection of valuable objects not forming part of the Collection (e.g. works of reference) and create a record of its valuable non-Collection possessions.
6. The Museum should introduce a requirement for MI+ to be updated promptly when items in the Collection are moved.
7. The Museum should review its Collection Care strategy to ensure it allocates responsibility for the security of the Collection; removes potential areas of friction between curatorial staff and the Collections Care team; and provides adequate training to Collections Care staff to handle those parts of the Collection within their specific responsibility.

B. Risk

8. The Museum's current risk register should be replaced with one that draws on best practice in peer institutions.¹
9. The Museum should develop a risk tolerance statement.
10. Compliance with the Public Records Act, with Data protection and Freedom of Information should all appear on the Museum's risk register.
11. Meetings discussing risk should be attended by the manager directly responsible for the items under discussion.

¹ See e.g. the Treasury Orange Book requirements.

12. The major risks, and their direction of travel and mitigations, should be discussed at the Board as well as in Committee.
13. The Audit Committee (renamed as Audit, Risk and Compliance) should undertake 'deep dives' on specific areas of risk.

C. Internal Audit and Policies

14. Internal audit reports should comment on management awareness of any problem and the level of management co-operation.
15. Where there is a follow up audit to an unsatisfactory first audit, if matters have not been remedied then, in line with best practice, a more severe rating should be imposed.
16. Internal audit budgets should be agreed with the Chair of the Audit, Risk and Compliance Committee. The internal auditor must be sufficiently senior within the organisation to be able to perform the role and have an adequate budget.
17. Internal audit should increase to include more frequent and more extensive inventory checks of the Collection, including of the unregistered collection. The internal auditor should verify the progress towards full registration of the Collection.
18. The Museum requires a Document Management Policy. At our request the Museum has commenced an internal audit of its compliance with the Public Records Act. Its results should be reported to the Audit, Risk and Compliance Committee in due course.
19. The Document Management Policy should address document retention and deletion and the scope and frequency of back up records including cloud-based services.
20. Each policy of the Museum should have a designated 'owner' with responsibility for keeping it up to date. Each policy should also have other interested parties who must sign off on changes to the policy. Each policy should over a cycle be approved by Trustees.

D. Trustees and the Board

21. Trustees should be proactive in setting their agenda and requiring the necessary information to be able to take decisions and to receive proper assurance about management of the Museum under the Museum's Governance Principles and Procedures. They should ensure that management focus on the Museum's short, medium and long-term objectives as set by the Trustees with appropriate Key Performance and Key Risk Indicators to measure success.
22. The Board should regularly review the list of matters reserved to Trustees to ensure it is in line with best practice.
23. Trustees should introduce a 'buddy' system with Trustees being paired to parts of the Museum to encourage a two-way flow of information.
24. The Board should actively consider the Museum's culture and staff engagement. The Board should appoint a Trustee member of the Nominations and Remuneration Committee to

represent the employee view on the Board,² and the Committee's terms of reference should reflect responsibility for those matters.

25. Minutes of Trustee meetings (and of the Trustee and management committees) should be expanded to ensure that it is possible to understand the rationale for decisions made at meetings. Minutes should be circulated promptly following each meeting and all Trustees should receive minutes of all Trustee committees.
26. Between Trustee meetings the Chair and the Director should update Trustees on developments within the Museum by email or video conference.
27. The Trustees should review the trustee induction pack and compare it with that used in peer organisations.

E. Trustee Committees

28. The Board should create a Curatorial Committee in which Trustees and curatorial staff contribute to areas of importance such as the future exhibitions programme, the allocation of staff between departments, conservation programmes and progress on registration and digitisation of the Collection.
29. The Nominations and Remuneration Committee should have expanded terms of reference to take on oversight of staff matters, with access to exit interview notes, a staff engagement survey and the anonymous line for reporting concerns. The Committee should have oversight of allegations of misconduct and harassment (in all forms). They should also introduce and oversee a transparent and fair process for appointments and promotions and should be consulted on any material redundancy or restructuring proposal. The committee should be re-named to cover its enlarged remit.
30. The Investment Committee should have expanded terms of reference to include oversight of the finances of the Museum and should change its name to the Finance and Investment Committee.
31. The Audit Committee should become the Audit, Risk and Compliance Committee and have expanded terms of reference to have greater oversight of risk and compliance. These increased responsibilities will likely more frequent and/or longer meetings.
32. Existing Sub-Committees of the Standing Committee should become Sub-Committees of the Board and report directly to the Board of trustees.

F. Management

33. Trustees and the Director should consider the size and composition of the Directorate with a view to establishing a group in line with best practice and peer institutions to ensure capacity, sufficient challenge and diversity of thought.
34. The Directorate should adopt a modern and inclusive approach to management.

² See Government Green Paper on corporate governance (November 2016) at 2.34.

35. The Museum should strengthen the HR department and consider seeking external advice (including legal) where the Museum does not have the relevant expertise available. The Museum should improve the handling of complaints.
36. Management should review their approach to suspension of employees to give due weight to the protection of the collection, the integrity of its records and the wellbeing of staff.