


THE
NATIONAL
GALLERY


POLICIES &
PROCEDURES

A woman with blonde hair in a braid, wearing a teal shirt and a checkered apron, is seen from the back, working on a large, ornate gold frame. She is in a gallery or storage room with white metal grates in the background. The floor is a dark red carpet.

COLLECTIONS
MANAGEMENT
FRAMEWORK

June 2024

Collections Management Framework

Policy Title	Collections Management Framework
Departmental Owner	Director of Collections and Research
Published date	June 2024
Review date	June 2027
Version	1
Reference number	n/a
Circulation	 This work is marked with CC0 1.0 Universal. To view a copy of this license, visit https://creativecommons.org/publicdomain/zero/1.0/ .

Overview

The Collections Management Framework sets out the strategic context for collections management. Its purpose is to set the standards of care by which the collection is governed in order to enable the National Gallery to deliver on its strategic objectives.

The Collections management policy areas that make up the framework are:

- **Collection Development Policy** (also known as acquisition and disposal)
- **Collection Information Policy** (also known as documentation)
- **Collection Access Policy**
- **Collection Care and Conservation Policy**

The main audience for the framework is Gallery employees, the Executive Committee and Trustees.

The Gallery aims to be open and transparent in how it manages its collection and intends to make this framework available to the public and other institutions on our website. This approach is in line with other collecting institutions in the UK.

Contents

Overview	2
Contents	3
1 Collections Management Framework	7
1.1 Purpose	7
1.2 Statement of authority	7
1.3 Strategic objectives	8
1.4 Policy implementation	9
1.5 Accreditation	10
1.6 Policy Review Procedure	11
2 Collection Development Policy	12
2.1 Introduction	12
2.2 Statement of purpose and statutory requirements	12
2.3 History of the collections	13
2.4 An overview of current collections	14
2.5 Themes and priorities for future collecting	16
2.6 Themes and priorities for rationalisation and disposal	17
2.7 Legal and ethical framework for acquisition and disposal of items	17
2.8 Collecting policies of other museums	17
2.9 Archival holdings	18
2.10 Acquisition	18
2.11 Human remains	19
2.12 Biological and geological material	19
2.13 Archaeological material	19
2.14 Exceptions	19
2.15 Spoliation	20
2.16 Disposal procedures	20

3	Collection Information Policy	24
3.1	Introduction	24
3.2	Principles	24
3.3	Responsibilities and standards	25
3.4	Recording collection information	26
3.5	Managing collection information	30
3.6	Access to information	31
3.7	Risk management	33
4	Collection Access Policy	37
4.1	Introduction	37
4.2	Principles	37
4.3	Overarching aims	37
4.4	Access to the Gallery's buildings	38
4.5	Activities for all	38
4.6	Responsibilities and accountabilities	38
4.7	NG200 capital project	39
4.8	Building, facilities and resources	40
4.9	Access plan	41
4.10	Equality, diversity and inclusion (EDI) – Employees	41
4.11	Equality Diversity and Inclusion Plan	42
4.12	Audiences	42
4.13	Use of the Collection	43
4.14	Displays	44
4.15	Access to works in store	45
4.16	Interpretation	45
4.17	Digital access	47
4.18	Exhibitions	48
4.19	Loans in (borrowing)	49

4.20	Due diligence	50
4.21	Loans out (lending)	50
4.22	Learning programmes	51
4.23	Collection information	52
4.24	Research	53
4.25	Research strategy	53
4.26	Scholarship	54
4.27	Research resources	54
4.28	Library and Archives	55
4.29	Technical research	56
5	Collection Care and Conservation Policy	57
5.1	Introduction	57
5.2	Principles	57
5.3	Responsibilities and standards	57
5.4	Expertise and communication	58
5.5	Preventive conservation	59
5.6	Conservation	60
5.7	Risk management	62
5.8	Control of exposure to light and UV radiation	62
5.9	Control of relative humidity and temperature levels and variations	63
5.10	Exclusion of pollutants	64
5.11	Control of pests and mould	64
5.12	Control and or exclusion of impact damage, shock and vibration	64
5.13	Condition checking	65
5.14	Conservation treatment	65
5.15	Acquisitions	66
5.16	Training and induction	66
	Appendix 1: Definitions	67

Appendix 2: Legal and Ethical Basis	71
Legal basis	71
Ethical codes	71
Sectoral standards	72

1 Collections Management Framework

1.1 Purpose

- 1.1.1 The Collections Management Framework sets out the strategic context for collections management. Its purpose is to set the standards of care by which the collection is governed in order to enable the National Gallery to deliver on its strategic objectives.
- 1.1.2 Collections management is an active and continual process through which the Gallery develops, manages and cares for its collection for current and future use.
- 1.1.3 The Gallery aims to achieve a balance between access, preservation, the needs of the collection, and the needs of the people who use them. Realising this balance is vital to successful collections management and key to achieving the aims set out in the Gallery's Strategic Objectives.
- 1.1.4 The Framework governs how those with responsibility for the collection will manage it, in order to create a consistent approach in keeping with recognised cultural collections standards and has been developed in consultation with departments across the Gallery.
- 1.1.5 The Framework has been structured according to the recommendations in the Code of Practice for Cultural Collections Practice (PAS 197: 2009), the Spectrum Collections Management Standard and the Museum Accreditation Scheme which give recommendations for the management of cultural collections by collecting organisations.
- 1.1.6 The Gallery aims to be open and transparent in how it manages its collection, and this framework is available to the public on our website. This approach is in line with other collecting institutions in the UK.

1.2 Statement of authority

- 1.2.1 The National Gallery is governed by the Museums and Galleries Act 1992 which states in Section 2:

The general functions of the new Boards.

- (1) So far as practicable and subject to the provisions of this Act, the National Gallery Board shall maintain a collection of works of art, principally consisting of pictures, of established merit or significance, and of documents relating to those works, and shall—

- (a) care for, preserve and add to the works of art and the documents in their collection;

- (b) secure that the works of art are exhibited to the public;
- (c) secure that the works of art and the documents are available to persons seeking to inspect them in connection with study or research; and
- (d) generally promote the public's enjoyment and understanding of painting and other fine art both by means of the Board's collection and by such other means as they consider appropriate.

1.2.2 The Gallery is a non-departmental public body, whose sponsor body is the Department for Culture, Media and Sport. The Director of the National Gallery is the Accounting Officer appointed by the Department for Culture, Media and Sport.

1.2.3 The Gallery is governed by a Board of Trustees. The establishment, constitution, functions and property etc. of the Board of Trustees can be found in Section 1 to the Museums and Galleries Act 1992.

1.2.4 The general functions of the Board of Trustees can be found in Section 2 to the Museums and Galleries Act 1992.

1.3 Strategic objectives

1.3.1 The National Gallery houses the national collection of painting in the Western tradition from the 13th to the 19th centuries. It is on show 361 days a year, free of charge.

1.3.2 The Gallery's aim is to care for the collection, to enhance it for future generations, primarily by acquisition, and to study it, while encouraging access to the pictures for the education and enjoyment of the widest possible public now and in the future

1.3.3 The collection belongs to the people of the United Kingdom. It is open to all.

1.3.4 The National Gallery has a number of key objectives to study, enhance and care for the collection.

Care for the collection

1.3.5 The Gallery will:

- Keep the pictures in the nation's collection safe for future generations by ensuring that we can account for them, maintaining a safe and appropriate environment for them, monitoring their condition regularly, and undertaking suitable restoration or conservation
- Do everything possible to secure the pictures from fire, theft and other hazards

- Do everything possible to ensure that pictures loaned out are in sound enough condition to travel and are loaned to suitable venues in terms of security, access and environmental conditions.

Enhance the collection

- 1.3.6 The Gallery will acquire great pictures to maintain and enhance the collection now and for future generations.

Study the collection

- 1.3.7 The Gallery will:

- Encourage all aspects of scholarship on the collection, developing research into, and documentation of, the pictures and maintaining a leading national and international role in the study of painting in the Western tradition, while ensuring that this work is disseminated.
- Enable access to the collection for the education and enjoyment of the widest possible public.
- Allow the public to use the collection as their own by maintaining free admission, during the most convenient possible hours, to as much as possible of the main collection.
- Display the pictures well.
- Help the widest possible public both in the Gallery and beyond to understand and enjoy the paintings, taking advantage of opportunities created by modern technology.
- Offer the highest possible standards in services for visitors.
- Be a national and international leader in all its activities.
- Work with other regional museums and galleries in the United Kingdom.

1.4 Policy implementation

- 1.4.1 Collections management is implemented through a set of component policies and procedures which lay out our principles and methods for the management, development, documentation and care of collection and where our priorities are focused over the period 2024–29.

- 1.4.2 The collections management policy areas that make up the framework are:

- **Collection Development Policy** (also known as acquisition and disposal)
- **Collection Information Policy** (also known as documentation)
- **Collection Access Policy**
- **Collection Care and Conservation Policy**

- 1.4.3 Priorities are also set by strategic plans:

- The National Gallery Strategic Plan (2021-26)
- Annual Corporate Plan

- Exhibitions Strategy (2018)
- Research Strategy (2024)
- Audience Strategy (2024)
- Collections Development Strategy (2024, subject to approval)

1.4.4 These are supported by actions plans which give detailed methodologies and targets to allow progress to be measured and assessed and will be developed after the policy documents have been adopted.

- Access Action Plan
- Collection Care and Conservation Plan
- Collection Information Development Plan

1.4.5 The implementation of the principles set out in the four key areas in this policy (including risk mitigations) are documented in the following:

- Access Policy (2024)
- Acquisitions and Accessioning Policy (2024)
- Displays Policy (2024, currently being updated for Accreditation)
- Exhibitions Policy (2024, currently being updated for Accreditation)
- Loans In Policy (2019)
- Loans Out Policy (2019)
- Emergency Plan (2024, currently being updated)

1.4.6 The Gallery's Documentation Manual (currently being updated for Accreditation) includes related policies (including risk mitigations) and procedures including:

- Object Entry Policy
- Collection Inventory Policy
- Location and Movement Control Policy
- Collection Information Rights Management Policy
- Reproduction Policy
- Insurance and Indemnity Policy
- Valuation Policy
- Collection Audit Policy
- Object Exit Policy
- Damage and Loss Policy

1.5 Accreditation

1.5.1 The National Gallery is an Accredited Museum. Accreditation is a UK industry standard for museums and galleries, providing the minimum standards through which museums and galleries can protect their collections for the future and promote wide engagement.

1.5.2 The Gallery is committed to the adoption of these standards through the governance and running of the museum, proper collections management and an accessible user experience.

1.5.3 The Gallery is committed to encouraging confidence in museums as organisations that research, manage collections for the benefit of society and reinforce the importance of a shared ethical and professional basis throughout the sector.

1.6 Policy Review Procedure

1.6.1 The Collections Management Framework will be reviewed and published, at least once every five years in line with the reaccreditation cycle, and ideally every three years. The date when the policy is next due for review is on or before May 2027.

1.6.2 Arts Council England will be notified of any changes to the Collections Management Framework, and the implications of any such changes for the future of collections.

2 Collection Development Policy

2.1 Introduction

- 2.1.1 This policy describes the history of the collections and the collections as they are now, including an overview of the priorities and themes for developing the National Gallery's collections. It outlines the legal framework within which the National Gallery operates and the legal obligations of the Board of Trustees of the National Gallery. It also covers policy for acquisitions and disposals.
- 2.1.2 This policy should be read in conjunction with the Collection Management Framework and Acquisition and Accessioning Policy.
- 2.1.3 The Collections Development Policy will be published and reviewed from time to time, at least once every five years.
- 2.1.4 Arts Council England will be notified of any changes to the collections development policy, and the implications of any such changes for the future of collections.

2.2 Statement of purpose and statutory requirements

- 2.2.1 The National Gallery's aim is to:
- care for the Collection, for future generations;
 - enhance the Collection, primarily by acquisition;
 - study the Collection, while encouraging access to the pictures for the education and enjoyment of the widest possible public now and in the future.
- 2.2.2 The National Gallery has a number of statutory objectives laid out under out under the Gallery and Galleries Act 1992 which states in Section 2 :
- The general functions of the new Boards.
- (1) So far as practicable and subject to the provisions of this Act, the National Gallery Board shall maintain a collection of works of art, principally consisting of pictures, of established merit or significance, and of documents relating to those works, and shall—
- (a) care for, preserve and add to the works of art and the documents in their collection;
 - (b) secure that the works of art are exhibited to the public;
 - (c) secure that the works of art and the documents are available to persons seeking to inspect them in connection with study or research; and

- (d) generally promote the public's enjoyment and understanding of painting and other fine art both by means of the Board's collection and by such other means as they consider appropriate.

- 2.2.3 The Gallery is governed by the Board of Trustees of the National Gallery who hold the Collection in trust on behalf of the nation. The establishment, constitution, functions and property etc. of the Board of Trustees can be found in Section 1 to the Museums and Galleries Act 1992. The general functions of the Board of Trustees can be found in Section 2 of the Act.
- 2.2.4 The Board delegates the authority to the Director to take operational decisions and, with the assistance of the Executive Committee, to comply with the obligations laid down by the Act. The Director is answerable to Parliament as the Accounting Officer responsible for the proper expenditure of public money granted to the Gallery.
- 2.2.5 The Board of Trustees will ensure that both acquisition and disposal are carried out openly and with transparency.
- 2.2.6 By definition, the Gallery has a long-term purpose and holds collections in trust for the benefit of the public in relation to its stated objectives. The Board of Trustees therefore accepts the principle that sound curatorial reasons must be established before consideration is given to any acquisition to the collection, or the disposal of any items in the Gallery's collection.
- 2.2.7 Acquisitions outside the current stated policy will only be made in exceptional circumstances.
- 2.2.8 The Gallery recognises its responsibility, when acquiring additions to its collections, to ensure that care of collections, documentation arrangements and use of collections will meet the requirements of the Gallery Accreditation Standard. This includes using Spectrum primary procedures for collections management. It will take into account limitations on collecting imposed by such factors as staffing, storage and care of collection arrangements.
- 2.2.9 The Gallery will undertake due diligence and make every effort not to acquire, whether by purchase, gift, bequest or exchange, any object or specimen unless the Board of Trustees or responsible officer is satisfied that the Gallery can acquire a valid title to the item in question.
- 2.2.10 The Gallery will not undertake disposal motivated by financial reasons.

2.3 History of the collections

2.3.1 Main Collection

The collection started with the purchase of 38 paintings from the collection of John Julius Angerstein, which included both historical Continental works as well as representative paintings from the British School and even a work by a then

living painter, Sir David Wilkie. At the start, there was no established annual purchase grant, so the growth of the collection was heavily reliant on gifts and bequests, which began with the Beaumont Gift in 1826 and the Holwell Carr Bequest in 1831. After 1855, when the Gallery's management was reconstituted, a new annual purchasing grant was established, and a policy instituted which envisioned the Gallery becoming the national repository of Western European art from its origins in the mid-13th century. This remained the case until 2014, when the Gallery acquired its first American painting, at which point the Gallery's strapline changed to indicate that it was a Gallery of paintings in the Western European tradition.

2.3.2 Contextual Collection

The Contextual Collection was formed in 2008, in order to exercise appropriate care for works of art owned by the Gallery, but which were not considered to be part of the normal collecting remit of the main/National Collection. These included works which illuminated and celebrated the history of the Gallery. This was called the 'History' collection but was renamed the 'Contextual Collection' in 2023, to reflect the broader range of objects in the collection, for example, those by associate artists.

2.3.3 Library Collection

The Library was established in 1870 with the purchase of the private library of some 2,000 volumes belonging to the late Sir Charles Eastlake, the first Director of the National Gallery.

2.4 An overview of current collections

2.4.1 Main Collection

The National Gallery houses the national collection of painting in the Western European tradition, spanning the period from the thirteenth to the early twentieth centuries. The Gallery aims to tell the story of painting in the Western European tradition as completely as possible and at the highest possible level. The collection includes masterpieces such as Van Eyck's *Arnolfini Portrait*, Piero della Francesca's *The Baptism of Christ*, Holbein's *Ambassadors*, Leonardo's *Virgin of the Rocks*, Vermeer's *Young Woman Standing at a Virginal*, Velazquez's *Rokeby Venus*, Turner's *Fighting Temeraire* and Van Gogh's *Sunflowers*. The work of some of the greatest painters, for example Raphael, Titian, Rembrandt, Rubens, Poussin, Monet and Cezanne, is represented in great depth, with a range of works of varying types and from different periods of the artists' careers.

The National Gallery is also custodian to the following collections, which are distinctly separate from the National Collection. The works in these collections are not subject to the constraints of the Gallery and Galleries Act 1992.

Collection development for the Library and Archive is supported by policies required for Archive Service Accreditation.

2.4.2 Contextual Collection

The National Gallery's Contextual Collection consists of works of art and objects, acquired by the Gallery since its foundation, which illuminate the history of the Gallery, its buildings, its collection and its relationship with contemporary artists.

The Contextual Collection includes portraits of former National Gallery staff, directors, trustees and benefactors; depictions of the Gallery's buildings and their interiors at different periods; internal and external architectural sculpture and mosaics forming part of the Gallery's fabric; and furniture and objects that have a significant connection to the Gallery. It also includes commissions, works of art by contemporary artists, including Artists in Residence or Associate Artists, as well as other artists whose work has been the subject of temporary exhibitions at the National Gallery, or who have worked directly from the collection.

2.4.3 Frame Collection

The Gallery consists of approximately 3,000 frames, including original frames acquired with certain paintings, antique frames subsequently acquired to frame Gallery paintings, and reproduction frames, either produced at the Gallery or externally at various moments.

2.4.4 Library Collection

The Library contains around 100,000 printed volumes relevant to the study of the history of paintings in the Western European tradition from the 13th to the early 20th century. The Library's holdings include monographs, catalogues raisonnés, exhibition catalogues, and pamphlets; works on iconography; permanent collection catalogues from the National Gallery and important galleries throughout the world; a fine collection of publications relating to private collections in this country and abroad; a significant collection of early guidebooks; a strong collection of early source works consisting of approximately 2,000 titles published before 1850; catalogues of picture sales from major auction houses and reasonably complete runs of the catalogues of certain commercial dealers; over 250 periodical titles, of which 150 are current.

2.4.5 Archive Collection

The National Gallery Archive holds records generated by the Gallery, from its establishment in 1824, in the course of its business. These records are Public Records, and the Archive is recognised as a Place of Deposit by the National Archives. Gallery records are selected for permanent preservation due to their evidential, informational or historical value, in line with the Public Records Acts of 1958 and 1967, and National Archives' standards.

The Archive holds records from individuals and corporate bodies, where they have a particular relevance to the history of the Gallery, its Collection, or the

history of collecting European paintings. This includes the private papers of staff, Trustees, collectors and academics, or papers relating to pictures in the Gallery's Collection.

The management of the Archive is guided by the Code of Practice on Archives for Museums and Galleries in the United Kingdom (third edition, 2002). The Archive Development Plan and Policy is managed separately to this policy through the Archive Service Accreditation.

2.5 Themes and priorities for future collecting

2.5.1 Collection remit for the Main Collection

The rationale for acquisitions for the Main Collection is guided by three principles:

2.5.1.1 Building on strength and acquiring outstanding masterpieces.

To 'add excellence to excellence' in areas of particular strength where the National Gallery's collection matches or surpasses the best in the world. These include large areas of the Italian Renaissance, 17th-century Dutch, and early modern French collections, where we have pictures by painters who are widely recognised (both within the scholarly community and by the general public) as having changed the direction of the history of European art, by their exceptional genius, and as acting as continued points of reference for subsequent generations. Certain individual esteemed masters are particularly well represented as well, including Raphael, Titian, Rembrandt, Velázquez, Rubens, Poussin, Claude and Degas.

2.5.1.2 Adding depth to the National Gallery's traditional areas of collecting

Acquiring great works by previously unrepresented artists or movements, including those that did not form part of the 19th-century canon but which are now recognised as enhancing the Gallery's status as one of the world's preeminent collections of paintings in the Western European tradition.

The Gallery also seeks to explain the history of artistic influence over time and so its collection also includes work by the most esteemed painter's networks, notably teachers, fellow pupils in a workshop, their pupils, and later followers.

2.5.1.3 Diversification of the National Gallery's collection in more radical ways

Acquisitions are the primary means of developing and reflecting changing ideas about the collection's broader meaning and purpose. This is based on the underlying assumption that the Gallery is uniquely well-placed to show the history of painting in the Western tradition in an exceptionally comprehensive way, and that it should continuously broaden and diversify that representation while retaining its quality. This will be addressed by expanding the chronological and geographical scope of the Main Collection, and equally through the gender

and heritage of artists (e.g. historically marginalised identities) who are currently not represented in the collection, as well as through the subject matter, narrative content and provenance of the paintings. By broadening the collection, we believe we can strengthen connections between the works within it, enrich its narratives, and build new audiences.

2.5.2 Collection remit for the Contextual Collection

The Contextual Collection contains painting as well as works on paper, photographs, sculpture or other types of objects.

2.6 Themes and priorities for rationalisation and disposal

2.6.1 The Gallery does not intend to dispose of collections during the period covered by this policy.

2.6.2 The Gallery has no current intention to dispose of works in its Collection but if any such disposal were to be considered in the future, it can only be made in accordance with the Museum and Galleries Act 1992 set out in paragraph 12.

2.6.3 Exceptions to this are the Conceptual and Frame collections. The Gallery has no current intention to dispose of works in these collections but if any disposal were to be considered, the Trustees will take decisions on a case-by-case basis, acting on the advice of the Director, Director of Collections and Research, and relevant Curator, and follow the procedures described in any relevant legislation.

2.7 Legal and ethical framework for acquisition and disposal of items

2.7.1 The Gallery recognises its responsibility to work within the parameters of the Museum Association Code of Ethics when considering acquisition and disposal.

2.8 Collecting policies of other museums

2.8.1 The Gallery will take account of the collecting policies of other museums and other organisations collecting in the same or related areas or subject fields. It will consult with these organisations where conflicts of interest may arise or to define areas of specialism, in order to avoid unnecessary duplication and waste of resources.

2.8.2 The National Gallery recognises its responsibility, in acquiring additions to its collections, to ensure that care of collections, documentation arrangements and use of collections will meet the requirements of the Accreditation Standard. It will take into account limitations on collecting imposed by such factors as staffing, storage and care of collection arrangements.

- 2.8.3 Specific reference is made to the following museums: National Galleries of Scotland; National Gallery Museum Wales; Tate; National Portrait Gallery; Victoria and Albert Museum.
- 2.8.4 The Gallery may, on occasion, enter into joint-acquisition agreements with other institutions. Any such agreements will clearly set out the terms of acquisition, including, but not limited to, the purchase price, conservation, insurance, ongoing costs and other practical arrangements around the long-term care of the object in question.
- 2.9 Archival holdings
- 2.9.1 As the National Gallery holds archives, including photographs and printed ephemera, its Board of Trustees will be guided by the Code of Practice on Archives for Museums and Galleries in the United Kingdom (3rd ed., 2002).
- 2.10 Acquisition
- The policy for agreeing acquisitions is:
- 2.10.1 Potential acquisitions are evaluated by the Director, Director of Collections and Research, and Curators. A full condition assessment is carried out by the Head of Conservation and Keeper, including technical examination, if required. Provenance and due diligence checks will be completed for each potential acquisition by the Curator and signed off by the Head of Curatorial, Head Registrar and Director of Collections and Research. A risk assessment will be completed for each potential acquisition by the Curator and the Gallery's Legal team and signed off by the Gallery Director. The Gallery's Head of Finance and the Gallery's Legal Counsel will advise on (a) funding, (b) tax and (c) the contractual terms. Where pictures are being acquired under Private Treaty Sale, HMRC will be consulted at an early stage.
- 2.10.2 When all due diligence and other checks have been completed, the Curator will prepare an Acquisition Proposal for the Board in the standard approved form, and the proposal will be taken to the Board for approval. The Trustees meet six times a year.
- 2.10.3 The Acquisition Proposal will confirm method of acquisition, value and maximum price of acquisition, sources of funding, condition assessment and all significant or relevant authoritative published references to the picture. It will demonstrate that full research into a painting's provenance (with any gaps in its provenance clearly stated), due diligence and valid export checks have been carried out to an acceptable standard. The risk assessment will be appended.
- 2.10.4 The National Gallery will exercise due diligence and make every effort not to acquire, whether by purchase, gift, bequest or exchange, any object or specimen

unless the Board of Trustees or responsible officer is satisfied that the Gallery can acquire a valid title to the item in question.

- 2.10.5 Acquisitions outside the current stated policy will only be made in very exceptional circumstances, and then only after proper consideration by the Board of Trustees of the Gallery itself, having regard to the interests of other galleries.
- 2.10.6 The Gallery will not acquire any object or specimen unless it is satisfied that the object or specimen has not been acquired in, or exported from, its country of origin (or any intermediate country in which it may have been legally owned) in violation of that country's laws. (For the purposes of this paragraph 'country of origin' includes the United Kingdom).
- 2.10.7 In accordance with the provisions of the UNESCO 1970 Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property, which the UK ratified with effect from 1 November 2002, and the Dealing in Cultural Objects (Offences) Act 2003, the Gallery will reject any items that have been illicitly traded. The Board of Trustees will be guided by the national guidance on the responsible acquisition of cultural property, issued by the Department for Culture, Media and Sport in 2005.
- 2.11 Human remains
- 2.11.1 The Gallery does not hold or intend to acquire any human remains.
- 2.12 Biological and geological material
- 2.12.1 The Gallery will not acquire any biological or geological material.
- 2.13 Archaeological material
- 2.13.1 The Gallery will not acquire any archaeological material.
- 2.14 Exceptions
- 2.14.1 Any exceptions to the above clauses will only be because the Gallery is:
- acting as an externally approved repository of last resort for material of local (UK) origin
 - acting with the permission of authorities with the requisite jurisdiction in the country of origin.

2.14.2 In these cases the Gallery will be open and transparent in the way it makes decisions and will act only with the express consent of an appropriate outside authority. The Gallery will document when these exceptions occur.

2.15 Spoliation

2.15.1 The Gallery will use 'Spoliation of Works of Art during the Holocaust and World War II period: Statement of Principles and Proposed Actions', issued by the National Gallery Directors' Conference in 1998, and report on them in accordance with the guidelines.

2.16 Disposal procedures

2.16.1 General

2.16.1.1 All disposals will be undertaken with reference to the Spectrum primary procedures on disposal.

2.16.1.2 The Board of Trustees will confirm that it is legally free to dispose of an item. Agreements on disposal made with donors will also be taken into account.

2.16.1.3 When disposal of a Gallery object is being considered, the Gallery will establish if it was acquired with the aid of an external funding organisation. In such cases, any conditions attached to the original grant will be followed. This may include repayment of the original grant and a proportion of the proceeds if the item is disposed of by sale.

2.16.1.4 When disposal is motivated by curatorial reasons, the procedures outlined below will be followed. The method of disposal may be by gift, sale, exchange or – as a last resort – destruction.

2.16.1.5 The decision to dispose of material from the collections will be taken by the Board of Trustees only after full consideration of the reasons for disposal. Other factors, including public benefit, the implications for the Gallery's collections and collections held by other museums or organisations collecting the same material or in related fields, will be considered. Expert advice will be obtained and the views of stakeholders, such as donors, researchers, local and source communities and others served by the Gallery, will also be sought.

2.16.1.6 A decision to dispose of a specimen or object, whether by gift, exchange, sale or destruction (in the case of an item too badly damaged or deteriorated to be of any use for the purposes of the collections or for reasons of health and safety), will be the responsibility of the Board of Trustees of the Gallery, acting on the advice of professional curatorial staff, if any, and not of the curator or manager of the collection acting alone.

- 2.16.1.7 Once a decision to dispose of material in the Gallery's Contextual and Frames Collections has been taken, priority will be given to retaining it within the public domain. It will therefore be offered in the first instance, by gift or sale, directly to other Accredited Museums likely to be interested in its acquisition.
- 2.16.1.8 Once the decision has been taken to dispose of a work from the Main Collection, it may only be offered to those bodies named under Schedule 5 of the Act which are likely to be interested in the acquisition.
- 2.16.1.9 If the material is not acquired by any Accredited Gallery to which it was offered as a gift or for sale, then the Gallery community at large will be advised of the intention to dispose of the material normally through a notice on the MA's Find an Object web listing service, an announcement in the Museums Association's Museums Journal or in other specialist publications and websites (if appropriate).
- 2.16.1.10 The announcement relating to gift or sale will indicate the number and nature of specimens or objects involved, and the basis on which the material will be transferred to another institution. Preference will be given to expressions of interest from other Accredited Museums. A period of at least two months will be allowed for an interest in acquiring the material to be expressed. At the end of this period, if no expressions of interest have been received, the Gallery may consider disposing of the material to other interested individuals and organisations giving priority to organisations in the public domain.
- 2.16.1.11 Any monies received by the Gallery Board of Trustees from the disposal of items will be applied solely and directly for the benefit of the collections. This normally means the purchase of further acquisitions. In exceptional cases, improvements relating to the care of collections in order to meet or exceed Accreditation requirements relating to the risk of damage to and deterioration of the collections may be justifiable. Any monies received in compensation for the damage, loss or destruction of items will be applied in the same way. Advice on those cases where the monies are intended to be used for the care of collections will be sought from the Arts Council England.
- 2.16.1.12 The proceeds of a sale will be allocated so it can be demonstrated that they are spent in a manner compatible with the requirements of the Accreditation standard. Money must be restricted to the long-term sustainability, use and development of the collection.
- 2.16.1.13 Full records will be kept of all decisions on disposals and the items involved and proper arrangements made for the preservation and/or transfer, as appropriate, of the documentation relating to the items concerned, including photographic records where practicable in accordance with Spectrum procedure on deaccession and disposal.
- 2.16.1.14 The National Gallery will not undertake disposal motivated by financial reasons. Past disposals at the National Gallery were undertaken for curatorial reasons and this would also be the principal motivation for any future disposals.

2.16.2 Disposal by exchange

- 2.16.2.1 The nature of disposal by exchange means that the Gallery will not necessarily be in a position to exchange the material with another Accredited Gallery. The Board of Trustees will therefore ensure that issues relating to accountability and impartiality are carefully considered to avoid undue influence on its decision-making process.
- 2.16.2.2 In cases where the Board of Trustees wishes for sound curatorial reasons to exchange material directly with Accredited or non-Accredited Galleries, with other organisations or with individuals, the procedures in paragraphs 2.16.1.1–2.16.1.5 will apply.
- 2.16.2.3 If the exchange is proposed to be made with a specific Accredited Gallery, other Accredited Galleries which collect in the same or related areas will be directly notified of the proposal and their comments will be requested.
- 2.16.2.4 If the exchange is proposed with a non-Accredited Gallery, with another type of organisation or with an individual, the Gallery will place a notice on the Museum Association's 'Find an Object' web listing service or make an announcement in the Museum Association's *Journal* or in other specialist publications and websites (if appropriate).
- 2.16.2.5 Both the notification and announcement must provide information on the number and nature of the specimens or objects involved both in the Gallery's collection and those intended to be acquired in exchange. A period of at least two months must be allowed for comments to be received. At the end of this period, the Board of Trustees must consider the comments before a final decision on the exchange is made.

2.16.3 Disposal by destruction

- 2.16.3.1 If it is not possible to dispose of an object through transfer or sale, the Board of Trustees may decide to destroy it.
- 2.16.3.2 It is acceptable to destroy material of low intrinsic significance (duplicate mass-produced articles or common specimens which lack significant provenance) where no alternative method of disposal can be found.
- 2.16.3.3 Destruction is also an acceptable method of disposal in cases where an object is in extremely poor condition, has high associated health and safety risks or is part of an approved destructive testing request identified in an organisation's research policy.
- 2.16.3.4 Where necessary, specialist advice will be sought to establish the appropriate method of destruction. Health and safety risk assessments will be carried out by trained staff where required.
- 2.16.3.5 The destruction of objects should be witnessed by an appropriate member of the Gallery workforce. In circumstances where this is not possible, e.g., the

destruction of controlled substances, a police certificate should be obtained and kept in the relevant object history file.

3 Collection Information Policy

3.1 Introduction

- 3.1.1 This policy ensures that the Gallery's collection information, and the tools used to manage and publish that information, provide useful and useable information.
- 3.1.2 Managing collection information effectively will enable the Gallery to function as efficiently as possible in its day-to-day activities, to support any projects that create or use collections information, and to regain a leading position in the management and dissemination of reusable and sustainable collections information.
- 3.1.3 This policy outlines how the Gallery manages collection information for the main collection and the contextual and frame collections. It covers the overall identification of, protection of, and maintenance of access to, vital records.
- 3.1.4 This policy should be read in conjunction with the Collections Management Framework.
- 3.1.5 Collection Information is also contained in the Library and Archives. The Archives, and access to the Library, are governed by the policies required for Archive Service Accreditation, whilst the Library is also subject to the Library Collecting Policy.

3.2 Principles

- 3.2.1 The National Gallery has a number of objectives laid out under the Museum and Galleries Act 1992 to care for the collection, to enhance it for future generations, and to study it and to share our expanded knowledge about our collection as widely as possible in a variety of appropriate ways. Collection information is one of our core functions.
- 3.2.2 Collection information supports all activities that relate to the collection, by:
- Managing the information required to carry out those activities
 - Recording the activities which take place, their authorisation, and their outcomes
- 3.2.3 Collection Information enables us to fulfil our responsibilities to account for our collection, ensure its security, manage it, and provide access to it, by:
- Ensuring accountability for the collection
 - Strengthening the security of the collection
 - Extending access to collection information

- Maintaining professional standards in collections management procedures and collection information

3.2.4 The National Gallery is comparatively unusual amongst museums, in that it has relatively few objects in its collections (around 2,400 in the main collection and 250 in the contextual collection) about which a great deal is known. This shapes the Gallery's ambition to share its information as widely as possible, in digital form: to publish 'everything we know about a painting, in one place'.

3.2.5 This Collection Information Policy is implemented and monitored through a series of related policies and procedures, identified in the Collections Management Framework. These, and other guidance documents, are assembled in the Collections Management site on the Gallery's intranet, which constitutes our Documentation Manual.

3.2.6 Management of the Gallery's collection information is complex, falling between different departments and teams, and using multiple systems. For these reasons, the Gallery maintains a Collection Information Data Management Plan (CIDMP). This enables us to proactively manage collection data, by identifying:

- What data we create, and how it is created
- How we should manage, store, back up, and provide access to the data
- How the data should be described
- How we comply with ethical and legal requirements
- How we should identify the data that needs to be preserved, and how we should preserve it
- How we plan to share our data, and restrictions we may need to impose on that sharing
- Who is responsible for managing our data, and how we ensure they have the resources needed to do so

3.2.7 Collection Information is subject to a process of continuous improvement, as laid out in the Gallery's Collection Information Development Plan. This is reviewed on an annual basis overseen by the Director of Collections and Research.

3.3 Responsibilities and standards

3.3.1 The Gallery adheres to the following collection information standards and principles, which are specific to collection information:

- CIDOC, *International Guidelines for Museum Object Information: The CIDOC Information Categories* (1995)
- Object ID
- CIDOC, *Statement on Linked Data Identifiers for Museum Objects* (2012)
- The FAIR Principles
- Tim Berners-Lee, *Cool URIs Don't Change* (1998)

- Create Once, Publish Everywhere (COPE)

3.3.2 The Collection Information Manager is responsible for:

- Staying abreast of developments in relevant standards and guidelines, and updating the Gallery's collection information policies and procedures as suitable new standards are adopted
- Maintaining and developing the Gallery's CIDMP
- Managing the Gallery's collections management system, authoring system, middleware, and other collection information systems as required
- Maintaining an overview, and ensuring the interoperability, of the Gallery's production-level collection information systems

3.3.3 The Collection Information Working Group is responsible for supporting the Collection Information Manager in:

- Maintaining and developing the Gallery's CIDMP
- Maintaining an overview, and ensuring the interoperability, of the Gallery's production-level collection information systems

3.3.4 The Chief Librarian and Archivist is responsible for managing the life cycle of operational records.

3.3.5 Individual departments within the Collections and Public Engagement Directorates are responsible for the creation, and sometimes management, of collection information related to their activities.

3.3.6 The Information Systems Department is responsible for providing the underlying security, network, storage, backup and recovery infrastructure, and technical support, for production-level collection information systems.

3.4 Recording collection information

3.2 The Gallery's collections management system (currently TMS) is its authoritative repository for up-to-date core object information, and also a tool to assist employees in collections management procedures (acquisitions, exhibitions, loans in and out etc.). It therefore provides data to other Gallery systems which manage or provide access to collection information.

3.4.1 The objective when recording information in the collections management system is always to record it:

- Once only
- At the earliest possible opportunity
- Accurately
- Using consistent, agreed formats
- With sufficient detail to support the relevant procedures

- 3.4.2 Once recorded in this way, data from the collections management system can easily be re-used for a variety of purposes.
- 3.4.3 Current acceptable minimum levels of information are specified in the Gallery's Collection Inventory Policy.
- 3.4.4 In all cases, the Gallery will ensure that it records information to the standards laid down in the current version of *Spectrum: The UK Collections Management Standard*.

Objects recorded

- 3.4.5 The Gallery records information about its collections:
- Main collection
 - Contextual collection
 - Frame collection
- 3.4.6 The Gallery records information about objects temporarily in its care:
- Long loans in
 - Exhibition loans in
 - Temporary deposits
- 3.4.7 The Gallery may also record the details of certain objects which it neither owns (though it may once have done so), nor has cared for; but which provide contextual information about the collections, to aid the publication of research, or to provide an accurate picture of the Gallery's holdings over the course of its history:
- Transferred objects
 - Research objects
 - Virtual records
- 3.4.8 The way each category of object is identified in collection information records is specified in the Gallery's Collection Inventory Policy.

Information sources

- 3.4.9 In order to manage the Gallery's collection, sufficient data to identify and manage an object is always collected and recorded before the object enters the Gallery's care by the relevant curators, collection registrars, exhibition managers or the Framing Department, and entered into the collections management system.
- 3.4.10 For objects neither owned by the Gallery nor in its care, virtual records and contextual or research information, information is obtained by the Collection Information Team from Gallery sources (e.g. files, Annual Reports, departments conducting research), and entered into the collections management system by the Collection Information Team.

- 3.4.11 Cataloguing and research, and contextual information, is also recorded as the result of activities, investigation and digitisation of existing records, and research, carried out across the Gallery.

Information categories

- 3.4.12 The Gallery recognises that its collection information falls into three categories:
- 3.4.13 **Management information:** the basic information used to manage and account for the collection, comprising 'tombstone' identification data and procedural data (locations, exhibition records, loans in and out, etc.), managed in the collections management system.
- 3.4.14 The Gallery is committed to managing management information to established national and international standards.
- 3.4.15 **Cataloguing and research information:** the results of research into the collection, in the form of raw data and information, reports, and the Gallery's published catalogues.
- 3.4.16 The Gallery is committed to improving the management of existing cataloguing and research information, and implementing systems to manage the creation of new cataloguing and research information, to meet established national and international standards.
- 3.4.17 The Gallery is committed to scoping the work required to digitise cataloguing and research material.
- 3.4.18 **Contextual information:** additional information relating to the collection, but often held in other systems. It includes, but is not limited to, the following:
- Archive information is primarily managed in the Gallery's archive management system, managed by the Archives, and subject to a separate accreditation scheme
 - Audio-visual material is primarily managed by the Audio Visual Department, and managed in the Gallery's audio-visual digital asset management system
 - Images are primarily created and managed by the Photography and Imaging Department, and managed in the Gallery's still image digital asset management system
 - Library information is primarily managed in the Gallery's library management system, managed by the Library, and subject to a separate accreditation scheme
 - Narrative texts are created by members of various departments, as required by individual procedures and projects) and managed by the Collection information Team, using the Gallery's authoring system

Information for accountability

- 3.4.19 The Gallery maintains a minimum level of information that enables it to identify and locate all objects for which it is legally responsible. This includes:
- A clear statement regarding the object's status as part (or not) of the Gallery's collection
 - The object's current location
- 3.4.20 The Gallery records the following information in its Inventory for **all objects in the main collection**:
- Object number
 - Attribution (artist / maker / or, for unidentified artists, school; plus any necessary qualifiers)
 - Title
 - Acquisition method
 - Accession date
 - Acquisition source (if given)
 - Acquisition price (if purchased)
- 3.4.21 The Gallery records in its collections management system the following data for all accessioned objects:
- Whether or not the object has an incomplete 1933-45 provenance (accessioned objects only)
- 3.4.22 From autumn 2024, the Gallery will record in its collections management system the following data, previously recorded on paper, for all objects which enter its care:
- Provenance
 - Information to manage the due diligence process and record approval for the object to enter the Gallery's care

Information for collection care

- 3.4.23 The Gallery records additional information in its collections management system in order to care for its collection, e.g. light level requirements, current glazing.

Catalogue information

- 3.4.24 The Gallery records additional information in its collections management system and multiple other systems and formats, including print, to provide summary and detailed catalogue information about its collection.
- 3.4.25 Object catalogue information may be recorded as part of a collections management procedure, e.g. the arrangement of a loan in or organisation of an exhibition.

- 3.4.26 The Gallery will implement procedures to ensure that core catalogue information in its collections management system is kept up-to-date in the light of research and new discoveries.
- 3.4.27 Changes to attributions and credit lines are approved by the relevant curator and confirmed by the Director.
- 3.4.28 Changes to other core catalogue information are approved by the relevant curator and confirmed by the Director of Collections and Research or Head of Curatorial, depending upon their significance.

Information for retrieval and access

- 3.4.29 The Gallery records additional information in its collections management system for the main and contextual collections, and long loans in, in order to help with the publication of its collections and the retrieval of information by its audiences.
- 3.4.30 The Gallery recognises that 'indexing' information may be useful for retrieval without necessarily representing the latest research or thinking on a particular subject, and therefore applies index terms liberally rather than restrictively.
- 3.4.31 The Gallery generates its own digital persistent identifiers (PIDs) for objects in the main and contextual collections.

Contextual information

- 3.4.32 In order to support the understanding and use of the collection by expert and non-expert audiences, the Gallery also records contextual and interpretative information in a variety of forms and systems, both analogue and digital.

3.5 Managing collection information

- 3.5.1 The Gallery keeps its collection information as up-to-date as possible. It will put in place procedures to ensure that, as new information becomes available, it is captured and recorded in the appropriate management system, so that it can be accessed by all those who need it.
- 3.5.2 The Gallery's collection information is, like other Gallery records, subject to the Gallery's records management framework, managed by the Gallery's Archivist. The retention schedules for individual classes of document are noted in the relevant policy.

Digital information

- 3.5.3 The Gallery stores its digital collection data in a set of agreed file formats.
- 3.5.4 The Gallery is committed to implementing a data preservation framework, which will include collection information, to ensure that data is protected against corruption and loss, and is migrated into new management and storage systems and formats before current ones become obsolete.

- 3.5.5 In the meantime, data will be migrated from electronic systems that are in danger of obsolescence, to more current systems. This will be done in a timely and orderly way that causes as little disruption as possible to the daily operations of the Gallery and its public-facing information.
- 3.5.6 The Gallery divides systems which manage and share the Gallery's data into two categories:
- 3.5.7 **Production systems:** systems that are relied on by the Gallery for its day-to-day activities and publication of data. These must be:
- Integrated into the Gallery's core information systems infrastructure
 - Maintained and upgraded on a regular basis throughout their lifecycle, so that they continue to be supported by their supplier or community, and do not rely on vulnerable, deprecated or unsupported technologies
 - Reviewed every three years against Gallery requirements and procedures to ensure their continued suitability
- 3.5.8 **Research systems:** experimental systems, often providing demonstrators or proofs-of-concept for innovative methods of data handling and publication:
- These may use non-standard technologies and be hosted entirely by their owning department
 - These are not expected to be maintained in the medium- to long-term

Analogue information

- 3.5.9 The **Inventory** (accession register) is held and managed by the National Gallery Archives; it is kept up to date by the Head Registrar.
- 3.5.10 The **Conservation Dossiers** are held and managed by the Conservation Department; material is created by individual members of the Department, and added to the dossiers by the Department's Personal Assistant.
- 3.5.11 The **Curatorial Dossiers** (history/object files) are held and managed by the Research Centre; material is assembled by members of the Curatorial Department, and physically added to the dossiers by the Library and Archives.
- 3.5.12 The **Frame Dossiers** are held and managed by the Framing Department; material is added to the dossiers by the Frame Conservator.
- 3.5.13 The **Scientific Files** are held and managed by the Scientific Department; material is created and added to the dossiers by individual members of the Department.

3.6 Access to information

- 3.6.1 The Gallery is committed to making its collection information accessible to:
- Employees, ensuring that they have easy access to all the information required to carry out their jobs

- Its audiences, sharing its information as widely as possible, in digital form, and under as open a licensing regime as possible

3.6.2 The Gallery provides access to information through multiple routes, as appropriate for the information in question, ranging from direct access by employees to electronic systems, to the public website and printed publications.

3.6.3 The Gallery documents collections management procedures and makes them made available to employees in the most appropriate way, e.g. the employee intranet.

3.6.4 The Gallery aims to meet diverse audiences' differing information needs, some of which may be met by 'raw' collections information, whilst others may require additional layers of interpretation to be applied to the 'raw' information, in order to reduce barriers to learning about, and enjoying, the collection. Such interpretation is itself a form of collection information.

3.6.5 The Gallery also recognises that all its audiences should have direct access to the results of its research into its collection.

3.6.6 When providing access to information, the Gallery takes into account:

- The need to raise revenue using commercial licensing arrangements
- The safety and security of the collection
- The Gallery's legal and moral obligations with regard to data protection, other people's intellectual property rights, and safeguarding

Information retrieval

3.6.7 The Gallery is committed to providing systems to retrieve its analogue and digital collections information. The specific systems depend upon the information being managed, and will change as systems and information evolve.

3.6.8 For Gallery employees, every digital system provides access by accession number. In most systems, other criteria, such as maker and title, can also be searched; whilst the Gallery's middleware provides a full text search capability.

3.6.9 The core analogue records – Inventory, Conservation Dossiers, Curatorial Dossiers, Frame Dossiers and Scientific Files – are all retrievable by accession number.

3.6.10 The Gallery is committed to extending the range of public access points to its collection information beyond the basics of artist, title or accession number, in order to make the information more accessible to audiences who may be unfamiliar with the kinds of objects that make up our collection.

Digital data

3.6.11 The Gallery publishes its collection data according to established external technical standards (protocols, data profiles and data formats).

- 3.6.12 In order to provide a robust and seamless framework for sharing collection information, the Gallery uses middleware to:
- Aggregate data from multiple sources
 - Render data seamless to consuming applications
 - Insulate consuming systems from changes to source systems
 - Provide data endpoints that meet established international standards and are suitable for querying by machines
- 3.6.13 The Gallery shares its public collection information openly with aggregators such as Art UK and the Museum Data Service.

Analogue information

- 3.6.14 Analogue information may be consulted by Gallery employees either directly, or by application to the department which manages the resource in question.
- 3.6.15 Analogue information may be consulted by members of the public, in line with the principles on access set out in the National Gallery Policy on Access to Archives. Such access will take into account the data protection, confidentiality or security implications of some types of information, and such information will be redacted if necessary before the information is consulted by external users.
- 3.6.16 The Gallery is committed to a programme of digitisation which will enable an increasing number of analogue records to be provided to remote users using electronic communications where possible.

3.7 Risk management

- 3.7.1 In order to carry out their duties, many employees have access to sensitive collection information.
- 3.7.2 There are many potential risks for the Gallery which could arise from the inappropriate use or communication of sensitive information, including:
- Theft
 - Loss of reputation with influential individuals, the museum sector as a whole, or the public at large
 - Loss of future donations
 - Refusal of future loan requests
 - Legal action

Employee obligations with respect to sensitive collections information

- 3.7.3 Access to sensitive collection information is restricted to employees in order that they can carry out their duties. Consequently, the collections management system is not made available to all staff, but is used to a varying extent within the Art Handling, Collection Information, Collection Registrars, Conservation, Curatorial, Exhibitions, Framing, Library and Archives, NGG, Photography and

Imaging, and Security Teams or Departments, as well as by a selected few others.

- 3.7.4 The Collection Information Team maintains a series of procedures that enable detailed sensitive information to be held in the collections management system without being released more broadly, and it is crucial for data integrity and management that employees adhere to these procedures and do not try to circumvent them in the belief that they need to provide greater protection to information.
- 3.7.5 Employees who have access to restricted information should not share that information beyond the departments listed above.
- 3.7.6 Responses to requests for information made by the public or other third parties such as sister institutions, media organisations etc. must take into account the following factors:
- The safety and security of the collection
 - The Gallery's legal and moral obligations with regard to data protection, other people's intellectual property rights, and safeguarding
- 3.7.7 All employees must therefore adhere to the following principles when handling sensitive information:
- 3.7.8 All employees must be mindful of the need to protect sensitive information at all times, including storage and disposal.
- 3.7.9 Information about private individuals or their property must never be released into the public domain without the explicit permission of the owner.
- 3.7.10 Sensitive information exported to, or generated in, Word, Excel, PDF, etc. documents; or printed on paper; must be protected as carefully as information held in the collections management system or other information management systems.
- 3.7.11 Sensitive information printed onto lists, loan forms, etc., must not be left lying around and easily available to passers-by, including other Gallery employees. When such documents are finished with, they must be shredded or sent for confidential destruction, not thrown away in regular bins.
- 3.7.12 Sensitive information must not be used as a prompt or data source for any open / online Artificial Intelligence (AI) system (e.g. ChatGPT, Bard or Llama).
- 3.7.13 Where there is any doubt on the appropriateness of releasing a particular piece of information to either employees or the public, employees must consult their line managers for advice.
- 3.7.14 All decisions on release of information must comply with Gallery obligations under Freedom of Information and Data Protection legislation.

- 3.7.15 Sensitive information should only be made available to other employees with a specific need to know the information for operational purposes.
- 3.7.16 Private information about individuals and their property must never be released to the press, public or wider museum community without the explicit permission of the individuals themselves. Such permission should be sought via the Collection Registrars (long loans in and temporary deposits) or Exhibitions Department (exhibition loans in) in the first instance, as they make many of the loan and acquisition arrangements and will normally know the preferred method of contact. Any permission granted or declined must be documented on the relevant file.
- 3.7.17 The Gallery's Freedom of Information Coordinator must be informed of any external requests for access to sensitive information, to advise on appropriate action. The Gallery's Coordinator is the Archivist.
- 3.7.18 When in doubt about any aspect of the protection of sensitive information, employees must always consult their line managers for advice on the best way to proceed.
- 3.7.19 Computer users must only access the Gallery network and systems using their own login, and must not allow other people to know or use their login details.
- 3.7.20 Employees must report any known breaches of these guidelines (deliberate or accidental) using the Gallery's Data Breach Procedure.
- 3.7.21 Any communication (verbal, or by email, instant messaging, or telephone, etc.) between employees or with third parties must be conducted with reference to these guidelines and principles.
- 3.7.22 In addition to the responsibilities outlined immediately above, line managers must:
- Ensure that their teams are aware of and have read and understood Gallery guidance on accessing and handling confidential and sensitive information.
 - Emphasise the importance of a rigorous and cautious approach to managing sensitive information to their teams.
- 3.7.23 Inappropriate or careless handling of sensitive information is taken extremely seriously and could result in a formal disciplinary procedure being started against the relevant employee. In serious cases this could result in dismissal.

Information security

- 3.7.24 The Gallery ensures the physical security of its collection information, whether analogue or digital.
- 3.7.25 The storage and security of the Gallery's digital collection information is described in detail in the Gallery's CIDMP.

- 3.7.26 Access to digital records is controlled, and provided only to employees who have received appropriate training and guidance.
- 3.7.27 The Gallery's collections management system provides a full audit trail of changes to core data entry, including a record of user details.
- 3.7.28 Location information entered in the collections management system cannot be deleted. Location information is audited regularly according to the Gallery's Collection Audit Policy.
- 3.7.29 The Gallery's Inventory is stored in a locked fireproof safe in a store to which access is further restricted. A back-up copy is held in the Tate Archive.
- 3.7.30 Other core analogue records are stored in locked rooms and/or filing cabinets, with access restricted to the owning department or select identifiable individuals. There is a preservation copy of the Manuscript Catalogue, and the Gallery is planning the Conservation Dossiers' full digitisation.

Emergency access to collections information

- 3.7.31 Off-site access to the collections management system is available to Gallery staff through the standard remote desktop. The underlying systems are backed up daily, with backups stored to separate cloud repositories using immutable storage.
- 3.7.32 In the event of an emergency involving total loss of access to Gallery systems, summary object information, in the form of a daily-updated list of all objects with their locations, can be accessed on an encrypted USB stick.

4 Collection Access Policy

4.1 Introduction

4.1.1 This policy covers how we make our collection accessible to the public and how we engage with audiences to give them a better experience through learning, display, exhibition, loans and research programmes based on the Gallery's collection.

4.1.2 This policy should be read in conjunction with the Collection Management Framework and the Collection Information Policy as well as the following policies:

- Access Policy
- Loans Out Policy
- Loans In Policy
- Due Diligence Policy
- Displays Policy
- Exhibitions Policy

4.2 Principles

4.2.1 The National Gallery has a number of objectives laid out under the Museum and Galleries Act 1992 to care for the collection, to enhance it for future generations, and to study it and to share our expanded knowledge about our collection as widely as possible in a variety of appropriate ways.

4.2.2 Collection Access is one of our core functions. The Gallery's vision is to bring people and paintings together, making the nation's Gallery accessible for everyone everywhere.

4.3 Overarching aims

4.3.1 The Gallery aims to:

- Deliver more public benefit by continuing to increase access to and enjoyment of the National Gallery's collection
- Ensure that free entry to the main collection continues to be made available
- Use digital technologies to bring the Gallery's collection to audiences nationally and internationally that are unable to visit the Gallery's home in Trafalgar Square
- Continue to improve our welcome to all and ensure that our facilities make this possible

- Provide information in formats that are accessible to all visitors
- Align to the Gallery audience strategy
- Deliver an action plan to improve the physical, sensory, and intellectual access to the Gallery's collection, information about collection and access to the Gallery

4.4 Access to the Gallery's buildings

4.4.1 The Gallery will:

- Ensure all the Gallery spaces are accessible and inclusive where people can be themselves, feel represented and welcomed, fulfil their potential and connect fully with paintings and the stories they tell
- Provide all visitors with access to the building, making alternative provision where required, within the constraints of a Grade One Listed Building and health and safety regulations
- Ensure that building projects plan to provide physical access facilities for all visitors
- Consider the needs of all visitors in our safety procedures; all occupants of the building will be evacuated at the same time in an emergency

4.5 Activities for all

4.5.1 The Gallery will:

- Plan and deliver public activities to ensure that they are accessible and ensure a balance between care of collections and provision of access
- Deliver a wide range of learning programmes for different audiences, designed to suit differing levels of knowledge, backgrounds, interests, and learning styles
- Interpret the collection in ways which aims to meet a range of visitor needs
- Ensure digital presentations of our collection and resources are accessible both onsite and offsite
- Continue to consult people with disabilities, specialist organisations, and other museums and galleries, on the best ways of improving intellectual access

4.6 Responsibilities and accountabilities

4.6.1 As a service provider and equal opportunities employer, the Gallery complies with the Public Sector Equality Duty and Equalities Act 2010 and The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

- 4.6.2 The Executive leadership of the National Gallery retains overall responsibility and accountability for this policy, including its communication and promotion.
- 4.6.3 Ensure that equality and diversity awareness form an integral part of induction and ongoing training for all our people.
- 4.6.4 It is the Gallery's responsibility to ensure that all staff and contractors are aware of our access policy and the part they can play in putting it into practice.
- 4.6.5 The National Gallery EDI Committee aims to embed equality, diversity and inclusion across the National Gallery, and champion EDI with its partners and across the sector, supported by data, insight, and feedback.
- 4.6.6 The National Gallery Access Group meets regularly to discuss improvements to the Gallery's provision and to agree upon recommendations including from visitor feedback, access audits and assessments for further action. Recommendations from the Group are approved by and implemented through the Executive Committee, and, where appropriate, by the Trustees.
- 4.7 NG200 capital project
- 4.7.1 The Gallery's capability to create a welcome suitable for a world class institution, is currently restricted by existing facilities. We are addressing this through a series of capital works (NG200) over two phases to be completed by 2028.
- 4.7.2 These works will:
- Transform our Gallery providing a superb welcome experience by reconfiguring the Sainsbury Wing entrance, foyer, and café areas, creating a level access and be a more welcoming and inclusive space for all
 - Include the installation of a Changing Place and an accessible toilet on ground floor of Sainsbury Wing and the reintroduction of a Changing Place in the Roden Centre for Creative Learning
 - Include improved visual contrast of interior spaces
 - Celebrate the Gallery's historic setting by reimagining the public realm outside the Sainsbury Wing, creating a new public space with a widened entrance area and integrated security checks
 - Improve our visitors' experience by upgrading a host of amenities including new digital external signage and better toilet provision, with an emphasis on sustainability, accessibility, comfort, and wellbeing
 - Open our collection to a broader and more diverse demographic and communicate better with harder-to-reach groups in London, the UK and beyond
 - Transform our Education Centre into a Centre for Creative Learning for families and community groups, school children and adult learners

4.7.3 During this period the Gallery's ability to accommodate all access needs may on occasion be compromised until the new facilities become available. The Gallery is doing everything it can to continue to welcome all during this time.

4.7.4 The Access Policy will be updated in May 2025 when the first phase of the NG200 Capital Project completes.

4.8 Building, facilities and resources

4.8.1 The Gallery offers a range of facilities to help visitors enjoy the collection, visit exhibitions, and events including:

- step-free access at the Getty Entrance for visitors with mobility access requirements
- lift access and wheel-chair access to the galleries
- self-propelled and standard wheelchairs and a rollator
- seating around the gallery and folding stools
- complimentary carer tickets which can be booked with each disabled ticket
- first aid provision including one first aid room
- toilets including disabled and ambulant toilets (including a changing places toilet from February 2025 when the Centre for Creative Learning reopens)
- baby changing facilities
- spaces where you can eat or drink in the Gallery
- a designated pre-bookable accessible parking space
- signage and orientation maps around the building
- galleries and public areas staffed by employees who can give directions
- large print label guides in some locations and in exhibitions
- water bowls at information desks for assistance animals
- ear defenders available for pre-booked school groups

4.8.2 Employees are always on hand to support visitors in advance, or during their time at the Gallery and ensure visitors have a safe, enjoyable, and inspiring visit.

4.8.3 Where access may be restricted, the Gallery will seek to provide alternative provision.

4.8.4 The Gallery welcomes breastfeeding in all its galleries.

4.8.5 The Gallery website provides specific information for visitors with mobility access requirements, blind and partially sighted visitors and deaf or hard of hearing visitors and a visual story so visitors know what to expect in advance. The Gallery offers tailored support to individuals with access requirements as needed, and can be booked by calling +44 (0)20 7747 2885.

4.8.6 The website also provides information for visitors about:

- accessible transport
- designated blue badge parking bays proximity and booking details
- use of Mobility scooters, wheelchairs and buggies
- medical equipment
- nursing or baby care equipment
- assistance animals
- cloakrooms and bags

4.8.7 The Gallery's employees are trained to respond to emergencies including fire safety and first aid incidents.

4.8.8 The Gallery welcomes feedback or questions about access provision or barriers to access (via information@nationalgallery.org.uk).

4.8.9 The Access page on our website provides full details of our facilities.

4.9 Access plan

4.9.1 The Gallery has an Access Action Plan (2024–29) that sets out the way aims and improvements will be put into action.

4.10 Equality, diversity and inclusion (EDI) – Employees

4.10.1 The National Gallery is committed to championing and continuously developing its commitment to Equality, Diversity and Inclusion (EDI).

4.10.2 The Gallery has a formal EDI Delivery group, established to progress the EDI commitments of the Gallery which includes the remit of its workforce, programmes, its building and the access to collections – both onsite and online.

4.10.3 The Delivery group is made up of Heads of Department from across the Gallery and National Gallery Global, two Executive Director sponsors and representatives from the Gallery's Trade Unions and EDI staff network. The group meets quarterly and reports to the Director and Chair of Board on progress.

4.10.4 The Access Working group meets to discuss any access related issues or concerns pertaining to visitors (onsite and online) and reports to the EDI Delivery group.

4.10.5 The Gallery has an established EDI employee network which works to provide a support and discussion forum for employees.

4.10.6 The Gallery has six organisational Values, one of which is Diversity and Inclusion, and is committed to embodying these Values in annual reviews and recruitment.

4.10.7 The Gallery continues to be part of a sector-wide EDI network, which was established by the Gallery to create a supportive environment for shared learning and best practice.

- 4.10.8 The Gallery works with leading EDI training companies to deliver a suite of tailored learning and development programmes for employees which includes mandatory EDI Awareness training, along with courses on Unconscious Bias, Allyship and Neurodiversity Awareness.
- 4.11 Equality Diversity and Inclusion Plan
- 4.11.1 The Gallery is developing its formal EDI Action Plan, which sets out the way aims and improvements will be put into action.
- 4.11.2 The EDI Action Plan will be shared externally as well as internally to showcase the Gallery's commitment to EDI and to hold itself accountable to the goals and targets set.
- 4.11.3 The scope for the EDI Action Plan is to promote and embed a culture of inclusivity, equality, and diversity within the organisation and all it does. It aims to foster an environment where all individuals, regardless of their background, feel valued and have equal opportunities to engage with and contribute to the Gallery's mission and activities, which in turn will demonstrate the Gallery's evolving commitment to EDI.
- 4.11.4 The EDI Action Plan will be driven by ongoing assessment and feedback, and will play a vital role in advancing the Gallery's mission and commitment to EDI.
- 4.11.5 The EDI Action Plan will:
- Include a statement of intent to publish the plan both internally and externally
 - Establish a realistic timeline with milestones
 - Define clear and measurable EDI goals and objectives that align with the Gallery's mission and vision
 - Include a robust review and revision of existing policies and procedures to align with best practices in EDI
 - Continuously evolve language
 - Have a written expectations of behaviours and support processes for all who come into contact with the Gallery, inclusive of employees, contractors, visitors, and supporters
 - Use feedback and data to make necessary adjustments and improvements
 - Include a robust continued learning and development focus, with a compulsory training programme for our workforce
- 4.12 Audiences
- 4.12.1 The Gallery has a five-year Audience Strategy (to be implemented from May 2025 to May 2030).

- 4.12.2 The Gallery has developed a UK-wide segmentation model that identifies current and potential users of our collections, exhibitions and public programming (both physically and digitally).
- 4.12.3 The Audience strategy is designed to grow visitation onsite, diversify audiences by building new relationships, nurture long-term relationships through a consistent and dynamic offering, and expand income with a creative and sustained offer.
- 4.12.4 The Gallery actively consults users and stakeholders about use of its collection by carrying out rolling research with visitors and bespoke reports. It uses audience research, data and insight to improve outcomes for visitors. Rolling Research is reported on annually and presented to all staff, including the Executive team to inform the corporate planning cycle in the autumn.
- 4.12.5 The Gallery's rolling research is used to identify the differing access needs of our audiences. This research is administered via regular on-site fieldwork. The Gallery is a member of the Museums and Galleries Insight Consortium (MAGIC), and together asks a set of identical benchmarking questions in surveys so that the Gallery can compare its progress against other institutions over time.
- 4.12.6 The survey has been designed to be accessible and has been translated into 15 different languages. The survey covers a broad range of topics including demographics, motivations and outcomes. Questions asked in the survey specifically relating to access are:
- Respondent Disability – this allows the Gallery to identify visitors with a disability, long-term health condition, mental health condition, those that are d/Deaf and/or hard of hearing, neurodivergent, those that have reduced mobility, coeliac disease and/or any other health, mobility or access barrier.
 - Required adjustments – this allows the Gallery to monitor the adjustments that are requested by visitors to make their use of the collection and displays more comfortable and accessible. Visitors can select from a comprehensive list of adjustments under three categories:
 - **Information and ways of communicating** (e.g. British Sign Language (BSL) interpretation, Induction (or 'T') loop, information in large print etc.)
 - **Building and facilities** (e.g. step free access, accessible / Blue Badge parking, places to rest etc.)
 - **Staff and Support** (e.g. a pre-visit chat, guiding support etc.).

4.13 Use of the Collection

- 4.13.1 The Gallery's collection is used for displays, interpretation, exhibitions, lending and borrowing, learning programmes, research and scholarship.

- 4.13.2 Authorisation to use the collection, and legal, ethical and other considerations are set out fully in the associated policies signposted below, along with risk management approaches.
- 4.14 Displays
- 4.14.1 Access to the collection for the education and enjoyment of the widest possible public always was and remains a most fundamental principle of the National Gallery.
- 4.14.2 The Gallery aims to display approximately up to 50-60% of the collection subject to constraints by capital projects.
- 4.14.3 The main collection displays are structured in four clearly indicated chronological sections to create a strong framework by which visitors can navigate and understand the collection.
- 4.14.4 Curators work on a regular basis to improve the display for the benefit of the public by rehangng individual works, groups of paintings and interlinked areas of the Gallery's display. These are planned both for aesthetic reasons and to improve understanding of the hang in terms of the history of art.
- 4.14.5 The Gallery continues to improve its display by acquiring and restoring paintings in line with the Collection Development Policy and Collection Care and Conservation Policy.
- 4.14.6 The Gallery continues to improve its display by renewing, repairing, replacing and conserving picture frames, and by acquiring genuine period frames as resources and opportunities allow, in line with the Frame Policy.
- 4.14.7 The majority of the displays are behind rope barriers. For reasons of security or conservation, certain paintings on public display are glazed for their protection. Display cases are also used. The decision to glaze is guided by the Gallery's Glazing Policy.
- 4.14.8 To help us protect the collection, visitors are asked to follow the admissions policy and the instructions of our staff.
- 4.14.9 The Gallery seeks to avoid room closures during public hours whenever possible.
- 4.14.10 Where pictures are removed from display for building or maintenance works to rooms, alternative public display is often found, although certain pictures may require temporary storage for lack of alternative hanging space.
- 4.14.11 Information on pictures 'not on display' is available on the Gallery's website. Visitors are encouraged to use these information sources to further their enquiries.
- 4.14.12 The Gallery recognises that the overall display is also dependant on the state (and aesthetics) of decoration and repair of the rooms, and the standards of

lighting and lighting maintenance. The Gallery makes plans for major refurbishment and improvement of its rooms on a regular basis. Core building maintenance takes precedence over schemes for improved decoration.

4.15 Access to works in store

- 4.15.1 The Gallery maintains several environmentally-controlled storage facilities on-site. The collections are not stored off-site.
- 4.15.2 Access to the Collections in storage must be balanced against the need for conservation care, security of objects and availability of resources, to ensure their long-term preservation.
- 4.15.3 The Gallery will facilitate a request to view a painting in storage, although specialist staff, for example art-handlers, are not always available at short notice. Requests to see paintings by specialists and researchers would normally be given priority over casual enquiries, but the latter are also considered a service to the public.
- 4.15.4 Due to security issues, general public access to the picture stores is not permitted; a viewing area will be used instead. All visitor special access requests require a pre-arranged appointment and will be fully supervised. A record is kept of all special access visits. Photo ID and proof of address must be checked.
- 4.15.5 The Gallery will offer full reasons for a refusal where that decision is made.
- 4.15.6 The Gallery's Displays Policy sets out the Gallery's full policy and risk mitigations.
- 4.15.7 The Gallery's Collection Care and Conservation Policy sets out the Gallery's full policy and risk mitigations in particular about how the Gallery monitors risks to objects through use of its collection.

4.16 Interpretation

- 4.16.1 Interpretation in the collection galleries aims to draw on universal human experiences, encourage close looking and visual literacy and set the works in the context of their times to make our historical collection accessible, relevant and inspiring to contemporary audiences. It creates connections between artworks and artists across the whole collection and explores how artists over time and place responded to and reinvented traditions and conventions (including context, function and materiality). It also celebrates the history of how the National Gallery and its collection were formed and developed.
- 4.16.2 Encompassing print, digital and in-person engagement, the multi-layered interpretation offer is audience-focused and designed to reflect the diversity of visitors – from those looking at paintings for the first time, to repeat visitors seeking deeper insight. It aims to foster inclusion, agency, ownership and

creativity and to be continually enriched so that visitors always discover something new.

Gallery-based interpretation

- 4.16.3 Interpretation is written for a reading age of 11+ to 16+ to reflect universal secondary education. Language suitable for this reading age is pitched correctly for an adult without prior knowledge of a subject. The Gallery's tone of voice is warm, distinct, personal and sometimes surprising, conveying our rich, deep knowledge of the collection in clear, simple language.
- 4.16.4 Print interpretation in the galleries provides the introductory level of information about the collection, as well as interpretation written specifically for children.
- 4.16.5 Room panels in each gallery explain the theme of the display, the historical context and introduce key artists.
- 4.16.6 Artist labels identify important innovators and highlight the strengths of our collection, grouping paintings together, creating connections between artists and providing an accessible narrative route through the galleries.
- 4.16.7 Focus painting labels highlight our most significant works, providing focal points in each gallery and a pathway of masterpieces for first-time visitors who might otherwise be unsure where to begin. Labels for each painting explain unfamiliar subjects and encourage close looking.
- 4.16.8 Insight panels and labels provide context, explaining historical events, creating connections between paintings, revealing 'behind the scenes' material such as conservation stories, and showing reconstructions of altarpieces or other works from series.
- 4.16.9 History labels provide information about the Gallery's architecture and past.
- 4.16.10 The National Gallery Multimedia Guide powered by Smartify offers the next level of more detailed content for every painting on display, as well as a selection of thematic and 'Highlights' tours featuring diverse specialist voices from both inside and beyond the Gallery.
- 4.16.11 The Keeper of Paintings app offers an immersive experience for children aged 7 to 11.
- 4.16.12 Interpretation for key paintings is provided in multiple languages, including British Sign Language, visual descriptions and large print labels for blind and partially sighted visitors, as well as interpretation tailored for our neurodiverse visitors.
- 4.16.13 The Gallery offers a comprehensive programme of free in-gallery talks, tours, creative workshops and performances centred around the collection.
- 4.16.14 The Gallery offers talks delivered in British Sign Language (BSL) by Deaf lecturers as well as sessions delivered with BSL Interpretation for visitors who are D/deaf

and hard of hearing. Audio-described (AD) sessions are offered for visitors who are blind and partially sighted.

4.16.15 Other activities and the Friday Lates series which enables visitors to enjoy the collection and exhibitions after hours, offer special events including talks, performances, music and creative activities.

4.16.16 The Gallery also provides learners the opportunity to delve deeper into the collection by offering a series of courses, study days and conferences.

Families

4.16.17 The Gallery offers activities for children and young people of all ages to do, watch, make and learn including creative sessions during the school holidays.

4.16.18 From February 2025 the Centre for Creative Learning will provide free activities for families to enjoy every weekend and school holiday.

Sketching and drawing

4.16.19 Visitors are welcome to sketch and draw in the Gallery and take inspiration from the collection with the following guidance.

4.16.20 The National Gallery has always admitted students and professional artists and engravers to copy pictures from its Collection. Full-time art students, art teachers and practising artists can apply for a permit to copy paintings in the collection. Painting and use of materials other than pencils is only permitted under the Copyist Scheme.

Photography and filming

4.16.21 Photography and filming are allowed for personal and non-commercial purposes. It is the responsibility of anyone taking photographs or filming to ensure that no copyright is infringed.

4.16.22 Photography of some loan paintings may be restricted, as indicated by signs next to the paintings.

4.16.23 Photography and filming of children and young people is prohibited without the consent of the accompanying adult, this includes school groups and those attending family events. The Gallery recognises its responsibility to safeguard the welfare of all children, young people, and adults at risk.

4.16.24 Commercial filming and photography are not allowed in the Gallery without prior written permission.

4.17 Digital access

4.17.1 The Gallery provides digital access to its collections through:

- The website (www.nationalgallery.org.uk) which provides access to rich, free, additional information about all our paintings on display, aggregated from various collection information management systems, as well as research materials (see below)
- Livestreaming talks and events; online courses, talks and creative workshops
- Social media channels including Instagram, Facebook, YouTube, X (formerly Twitter), TikTok and Threads which have captions and/or transcripts; with alt text (where possible) on all image posts that are posted across the channels
- A self-guided Collection Audio Tour powered by the Smartify app, in English, Italian and French of the Gallery's highlight paintings with expert speakers, from curators and fashion historians to sports people to bring to life the stories behind the paintings
<https://www.nationalgallery.org.uk/visiting/audio-guides>
- Further painting stops are due to be added in September 2024 and May 2025, including BSL, AD and more international languages.
- Highlight paintings from our collection have free BSL video descriptions and audio descriptions, accessible on our website collection pages and the Smartify app
- Virtual tours and exhibitions on the website
- Wi-Fi throughout the building
- Interoperable data endpoints, offering FAIR data using established standards

4.17.2 The Gallery's website is designed to standards that aim to make it easy for visitors to get the information they need. Features include:

- Alt text provided for images where the detail of the image is not provided in the page or if the image enhances the understanding of the text
- Text transcript of video clips on the website, close captioning and text transcript of audio clips where possible
- Accessible forms
- Added HTML code to web pages so visitors' screen readers can skip the navigation to give access to the main content
- Adjustable text size on the website

4.18 Exhibitions

4.18.1 The Gallery's exhibitions aim to bring great paintings and other works of art to the Gallery and to display and interpret them to the highest possible standards in a balanced and stimulating programme in order to increase understanding and engagement with the collection. Exhibitions support the Gallery's vision to 'connect great art with people, and people with great art'.

- 4.18.2 The aims of the exhibitions programme are:
- To present well-conceived exhibitions examining art in a variety of ways, and executed to the highest standards
 - To stimulate public interest in the Gallery and its collection
 - To attract a wide range of visitors and to help them engage with works of art and to develop their interest in and understanding of art
 - To raise revenue to support the gallery and its activities, directly through ticket sales and sponsorship and indirectly through other commercial activities
- 4.18.3 Our exhibitions programme aims to attract a wide range of audiences.
- 4.18.4 Visitor research is conducted for exhibitions to monitor visitors' reactions and is discussed at internal debrief meetings.
- 4.18.5 The onsite exhibition programme enables the Gallery to 'broaden our audiences and provide an exceptional visitor experience' as well as to keep the Gallery at the forefront of public notice in the UK and abroad.
- 4.18.6 The touring exhibition programme makes the collection available to a wide public throughout the UK as part of the Gallery's national programmes.
- 4.18.7 Developing exhibitions in partnership with museums in the UK and abroad enables the Gallery to play its full part in the national and international museum community.
- 4.18.8 The Gallery's Exhibitions Policy sets out the Gallery's full policy and risk mitigations.
- 4.19 Loans in (borrowing)
- 4.19.1 Loans support our exhibition and long loan programmes which aim to:
- Connect great art with people, and people with great art
 - Encourage access to the collection for the enjoyment of the widest possible public
 - Promote the understanding, knowledge and appreciation of paintings in the Western tradition
 - Support our ambitious programme of major exhibitions
 - Add depth and breadth to our collection displays by reflecting a broader interpretation of art in the Western tradition and its wider influence, including unrepresented schools and genres
 - Help us to assess potential new acquisitions and/or new areas of interest
- 4.19.2 The National Gallery borrows works of art from both institutional and private lenders. Loans fall into two categories:
- Loans which are borrowed for display in the collection galleries

- Loans to the National Gallery’s programme of temporary exhibitions

4.19.3 The standard loan period for long-term loans is three years; loan periods are renewable. Loan agreements must have an end date; ‘permanent loans’ are not agreed.

4.19.4 Loans to exhibitions are borrowed for the period of the exhibition.

4.19.5 The Gallery’s Loans In Policy (borrowing), approved by the Board in May 2025, sets out the Gallery’s full policy and risk mitigations.

4.20 Due diligence

4.20.1 The Gallery understands it has a legal and ethical duty to acquire and borrow objects honestly and responsibly and understand the provenance of the cultural property it holds.

4.20.2 The Gallery will exercise due diligence for all acquisitions, loans and deposits and will not proceed to acquire the object or bring a loan or temporary deposit into the Gallery, without completion of the relevant checks.

4.20.3 The National Gallery is an approved institution and is able to provide immunity from seizure under part 6 of the Tribunals, Courts and Enforcement Act 2007. The Gallery acts within the parameters set out by the Department for Culture Media and Sport

4.20.4 The Gallery’s Due Diligence Policy sets out the Gallery’s full policy and risk mitigations.

4.21 Loans out (lending)

4.21.1 The Gallery lends paintings and other objects from its main collection, the contextual collection, Library and Archives. The loans policy also covers our collection going on loan as part of our own touring programmes and partnership exhibitions.

4.21.2 Lending is one of our core functions. Our loan out programme aims to:

- Connect great art with people, and people with great art.
- Widen national and international access to the collection
- Increase knowledge about the collection
- Support the strategic objectives of the National Gallery, including mounting major loan exhibitions
- Increase national and international co-operation
- Promote the understanding, knowledge and appreciation of painting in the Western tradition

- Reach new and diverse audiences, creating greater audience reach and engagement particularly amongst those who have the least access to art
- Exchange information and different practices; share skills
- Support the ambitions of, and collaborate with our peers
- Create new partnerships and help strengthen existing ones

4.21.3 Loans fall into the following categories:

- Loans to temporary exhibitions (single and multi-venue)
- Long-term loans (longer than 6 months)
- Our own touring and partner exhibition programmes
- Reciprocal loans made in exchange for loans made to the Gallery's temporary exhibitions

4.21.4 We aim to lend wherever possible and welcome loan requests from UK and international museums and galleries, and educational/research institutions with museums and galleries.

4.21.5 The Gallery's Loans Out Policy (lending), approved by the Board in May 2025, sets out the Gallery's full policy and risk mitigations.

4.22 Learning programmes

4.22.1 The Gallery's National Learning Service aims to enrich lives by connecting art, people and ideas across centuries, countries and cultures Schools programmes.

4.22.2 Whether online, in the Gallery, or in schools or other locations, the Learning department work with audiences across the country to support their learning.

4.22.3 The Learning Service offers programmes for children, young people and adults, suitable for all levels of interest and abilities.

4.22.4 Learners help the Gallery to bring new and diverse perspectives to paintings in the Collection.

4.22.5 The Primary Schools programme offers storytelling, talks, workshops and teaching resources for school groups for Early Year Foundation Stage (EYFS) to Key Stages 1 and 2. They aim to develop children's confidence, communication and creativity through tours, workshops, storytelling and our national Take One Picture programme.

4.22.6 The Secondary Schools programmes for Key Stages 3–5 offers lively talks, workshops and the national Articulation programme help students to prepare not only for exams, but for life beyond school.

4.22.7 The SEND programme offers tailored multisensory sessions for students with special education needs and disabilities (SEND).

4.22.8 Schools can also visit as self-guided groups.

4.22.9 The National Gallery's new Centre for Creative Learning will be opening early in 2025. This will provide larger and more dynamic spaces for making and talking about art, celebrating children and young people's creativity and encouraging imagination.

4.22.10 The National Gallery is committed to ensuring access to its collection (and sites) for all, including children, young people and adults at risk. The Gallery's Safeguarding Policy and Procedures are in place to ensure that anyone who engages with the National Gallery, whether onsite, offsite, online or in virtual environments is protected from harm.

4.22.11 Life-long learning opportunities for adults are provided by a series of free and ticketed events, including talks, tours, courses, creative workshops, music and performance. Events take place both onsite at Trafalgar Square and online.

4.23 Collection information

4.23.1 Managing collection information effectively enables the Gallery to function as efficiently as possible in its day-to-day activities, to support any projects that create or use collections information, and to regain a leading position in the management and dissemination of reusable and sustainable collections information.

4.23.2 Collection information supports all activities that relate to the Gallery's collection, by:

- Managing the information required to carry out those activities
- Recording the activities which take place, their authorisation, and their outcomes
- Extending access to collection information

4.23.3 Collection information is crucial to the Gallery's ability to account for its collection, and to provide access to the collection.

4.23.4 The Gallery's Collection Information Policy and Collection Information Data Management Plan sets out the Gallery's full policy and risk mitigations in relation to access to collection data for different users and stakeholders.

4.23.5 The following documents set out the Gallery's policy in relation to recording and managing information about and arising from use of the Gallery's Collections:

- Cataloguing Policy (conservation)
- Collection Care and Conservation Policy
- Framing Policy (framing)
- Reproduction Policy (photography)
- Cataloguing Policy (scientific investigation)
- Use of Collections Policy for Publication of the Collection (publication of reproductions of the collection)

4.23.6 The Gallery's Collection Information Rights Management Policy sets out the Gallery's full policy in relation to the management of intellectual property rights in images of the collection.

4.24 Research

4.24.1 Research is a constant and fundamental activity at the National Gallery, helping to underpin many areas of our work.

4.24.2 Research findings feed into the work of many departments at the Gallery and support:

- Exhibitions, scholarly catalogues and other publications
- The care and conservation of the pictures
- Their display and interpretation

4.24.3 Research contributes to the public understanding of the National Gallery collections and their context. The main collection is one of the most closely studied and thoroughly researched in the world.

4.25 Research strategy

4.25.1 The Gallery's Research Strategy (March 2024) sets the Gallery's research objectives (with milestones) for the initial years 2024-28.

4.25.2 Research is central to our public role and embodied within our constitutional responsibilities.

4.25.3 The Gallery is a pre-eminent centre for the research of painting in the Western tradition from the 13th to the early 20th centuries.

4.25.4 Research enables the Gallery to ensure that the paintings in its care are safe for generations to come.

4.25.5 Research allows the Gallery to enrich its understanding, to communicate with depth and authority, and helps the Gallery to better understand diverse, complex and sometimes contested histories and narratives behind the paintings. It facilitates new understanding of how best to engage its diverse audiences who range from scholars and specialists to first-time gallery visitors of all ages.

4.25.6 The vision for research at the National Gallery is to be the world's leading centre for research into painting in the Western tradition for the benefit of audiences everywhere.

4.25.7 This vision will be achieved through three interconnected aims.

- **Collection:** a richly researched collection and institution
- **Communication:** research has a wide external impact and reach

- **Community:** a strong, collaborative and vibrant research centre and community

4.25.8 All research at the National Gallery will fall under one or more of the following interconnected themes:

- **Making:** multi-disciplinary research into objects in the collection
- **Meanings:** art historical and related research on the collection, the institution and their histories
- **Practice:** research that innovates and develops our practice, including in the areas of collections care and conservation, digital, learning, and contemporary artistic practice
- **Understanding:** research that explores and evaluates how our collection and its context are understood by our audiences, and the benefits of that understanding

4.26 Scholarship

4.26.1 The Gallery pioneered and maintains a tradition of scholarly collaboration between dedicated teams of curators, scientists, conservators and archivists, now expanding to include a wider range of staff in the Digital and Learning teams especially.

4.26.2 Scholarly articles specifically devoted to the scientific study of pictures or their care are published in the *National Gallery Technical Bulletin*.

4.26.3 The Gallery seeks to support and advance excellence in the research of European painting, both nationally and internationally.

4.26.4 Scholarship is enriched by relationships and collaborations with academics from other institutions, whether in joint projects such as those under our current AHRC-funded Collaborative Doctoral Partnership scheme, or working with guest curators for our exhibitions or presenting papers in our active programme of conferences and seminars, some of which are jointly organised with external partners.

4.26.5 The National Gallery is recognised as an Independent Research Organisation (IRO) by UK Research and Innovation (UKRI).

4.27 Research resources

4.27.1 In-depth research on and examination of the pictures in the Gallery's care means that the information about them remains up-to-date and available to the public.

4.27.2 The Gallery is reviewing its scholarly publishing programme in the light of its new research strategy. The current policy will be updated in the light of the review's findings.

4.27.3 The Gallery's research resources, networks and services to aid researchers include:

- Files and dossiers (records) from past research (including documents, images, data (both digital and analogue)
- Scholarly catalogues (latest entries available online)
- Research papers
- Technical Bulletin
- Selected online publications
- Subject Specialist Network for European Paintings pre-1900
- Interfaith Sacred Art Forum and Sacred Art in Collections pre-1900 Network
- Women and the Arts Forum
- Past seminars and conferences

4.27.4 These networks and publications ensure that new research, conducted by employees and external experts, is disseminated to diverse audiences, both specialists and the general public.

4.28 Library and Archives

4.28.1 The National Gallery Library and Archives supports the Gallery's research strategy and ensures that its research resources are made available to the widest possible audience, including both national and international visitors and digital users, as well as Gallery staff.

4.28.2 The Library and Archives have primary responsibility for managing, conserving and providing access to the Gallery's library and archive collections.

4.28.3 The Library and Archives are open to visiting academics and post-graduate students including those on the Gallery's current co-directed Masters programmes and PhD cohort.

4.28.4 The National Gallery's public records are available within the Archives to all members of the public with an appointment in advance.

4.28.5 Although the Library is not generally available to undergraduate students, those who require access can be accommodated if they provide a letter of recommendation (in advance of a visit) from an academic referee indicating the need to visit the Library.

4.28.6 The Gallery supports academic programmes, including seminars, colloquia, study days and conferences, as well as working closely with research-active staff across the Gallery, academic partners and collaborators.

4.28.7 To encourage research and study, appointments can be made to consult Library and Archives material in person. Staff also respond to online enquiries about the

library and archival collections, including the history of the Gallery and its collection.

- 4.28.8 The Library contains around 100,000 printed volumes relevant to the study of the history of paintings in the Western European tradition. The library catalogue is available online.
- 4.28.9 The Archives contain records of the Gallery's activities from its foundation in 1824 to the present day. The Archives holds public records generated by the Gallery itself, and private papers relating to individuals or activities closely associated with the Gallery. Visitors can search the Archives online.

4.29 Technical research

- 4.29.1 The Head of Science is responsible for coordinating technical examination for research into materials and methods in support of remedial and interventive conservation treatments or to address other questions (including art-historical) that further understanding of the paintings in the collection. This includes technical and analytical imaging, other non-invasive analytical techniques and paint sample analysis.
- 4.29.2 Requests to take samples of material for micro-destructive analysis or testing are made on a case-by-case basis. Minimal destructive sampling/testing is undertaken only where appropriate.
- 4.29.3 The Gallery's Collection Care and Conservation Policy, approved by the Board in May 2025, sets out the Gallery's full policy and risk mitigations.

5 Collection Care and Conservation Policy

5.1 Introduction

- 5.1.1 The policy outlines the duty of care and responsibilities towards the long-term preservation of the Collection.
- 5.1.2 This policy should be read in conjunction with the Collection Management Framework and the Collection Care and Conservation Plan which sets out the way the policy will be put into action.
- 5.1.3 This policy outlines a summary of the Gallery's collection care activities and conservation for the main Collection and the Contextual and Frame collections. The care and conservation of the Archive and Library collections is supported by policies required for Archive Service Accreditation.

5.2 Principles

- 5.2.1 The National Gallery has a number of objectives laid out under the Museum and Galleries Act 1992 to care for the Collection, to enhance it for future generations, and to study it and to share our expanded knowledge about our collection as widely as possible in a variety of appropriate ways. Collection care and conservation are one of our core functions.
- 5.2.2 The purpose of collection care and conservation is to set a framework for:
- The long-term preservation of the Collection in the care of the National Gallery;
 - Preventive, remedial and interventive conservation of the Collection;
 - Balancing the safe use of and access to the Collection, within the limits of the Gallery's resources;
 - Promote a risk management approach to collection care.
- 5.2.3 The National Gallery's Conservation Department main purpose is to ensure the continued preservation of the paintings in the Collection. Conservation activities include examination, documentation and interventive treatment and Preventive Conservation, that is involves passive non-interventive activities including environmental monitoring, control of appropriate environment to actively manage light, temperature and humidity to meet specification.

5.3 Responsibilities and standards

- 5.3.1 The Head of Conservation and Keeper is responsible for:
- the strategic overview of all aspects of conservation;

- setting and ensuring the Gallery maintains the standards of collection care;
- programming and planning of conservation projects;
- monitoring the condition of paintings whilst undergoing treatment and for the progress of conservation work;
- engaging external specialists if needed

5.3.2 The Head of Conservation and Keeper is responsible for prioritising proposals for picture treatment in consultation with the Director, informed by continuous discussions with the Director of Collections and Research and collection curators. Proposals then go to the Board of Trustees for approval.

5.3.3 The Head of Science is responsible for:

- coordinating research into the nature and severity of environmental factors on the condition of paintings;
- recommending refinements to the controlled environment in consultation with the Head of Conservation and Keeper;
- coordinating technical examination, paint sample analysis and research into materials and methods in support of remedial and interventive conservation treatments.

5.3.4 The Head of Buildings and Facilities is responsible for controlling and monitoring the environmental conditions in the collection spaces (studios, stores and galleries)

5.3.5 The conservation and preservation of items in the care of the Gallery will be conducted to the highest possible standards using a risk management approach.

5.3.6 Conservation and preservation ethical guidelines include:

- Minimal intervention;
- Appropriate materials and methods that aim to be re-treatable to reduce possible problems with future treatments, investigation and use;
- Minimal destructive sampling/testing (where appropriate);
- Full documentation of all work undertaken;
- Comprehensive consultation with Curator throughout the agreed/proposed treatment.

5.3.7 The Gallery's internal auditors monitor procedures to ensure that standards are being maintained. This includes the documentation of agreed periodic inspection of all works. Conservation treatments themselves are approved and recorded by the Board of Trustees.

5.4 Expertise and communication

5.4.1 The Preventive Conservation Working Group (PCWG) is a cross departmental group, chaired by Conservation, responsible for raising the profile, importance

and profoundly positive impact of preventive conservation on the long-term preservation of the Collection.

5.4.2 Their objectives are to:

- raise awareness of risks and how to control/mitigate them;
- ensure that everyone working at the gallery understands the cultural importance and value of Collection and loans and the need for collection care and how this effects their work and behaviours;
- work collaboratively when activities around the Collection are being planned
- share information, establish parameters and guidelines for various types of activity and ensure that consistent advice is available to staff.

5.4.3 The Conservation and Scientific Departments offer advice and support to Gallery employees and colleagues across the sector including museums, galleries and independent conservators.

5.4.4 The Gallery seeks advice from external specialists and/or consultants when there is no in-house resource or expertise.

5.5 Preventive conservation

5.5.1 The long-term preservation of the Collection is achieved in part by providing a safe and appropriate environment for the Collection and by applying the principles of what is known generally as preventive conservation.

5.5.2 The Gallery aims to:

- control all environmental factors that have been proved to damage the Collection, or are suspected of causing damage;
- continue research to discover the nature and severity of these effects and approaches to minimise or mitigate any effects;
- refine environmental specification for display of the Collection;
- control the environment to meet the specification and monitor and archive the results;
- reduce risk to the minimum level that is feasible to achieve and is compatible with public access.

5.5.3 The Gallery deploys multiple safe control measures within and around collection spaces to protect the Collection and prevent / reduce the impact of the 10 Agents of Deterioration¹ on the Collection. These measures include:

- maintaining temperature and relative humidity within safe limits and parameters
- providing filtered air free of deleterious pollutants

¹ <https://www.canada.ca/en/conservation-institute/services/agents-deterioration.html>

- providing correctly filtered lighting and controlling lighting levels and cumulative light exposure from physical contact/impact, abrasion, shock and vibration (including noise induced vibration) for paintings on display and travelling on loan e.g. by providing barriers, keeping the Collection out of reach and away from potential hazards, use of suitable packaging and transportation methods etc.
- implementation and maintenance of integrated pest management (IPM) strategy and related activities (cleaning, housekeeping etc)
- providing robust security and fire safety procedures and protocols
- maintaining robust building maintenance programme including the Building Management System (BMS) that maintains and monitors the required environmental conditions (including light) in collection spaces
- collect, analyse and archive environmental data

5.5.4 The Gallery actively undertakes research on these risk factors to support the safety of the Collection. The effects of certain factors on paintings, particularly light exposure, are better understood and documented than others, for example atmospheric pollution. It is possible, also, that environmental factors act on paintings in synergy.

5.5.5 These factors are the subject of continuing research by the Scientific and Conservation Departments (in collaboration with other Gallery departments) with the aim of understanding better their effects on paintings and with the policy of continuing to refine environmental specification for the Collection. The long-term strategy is to improve preservation standards for the Collection.

5.6 Conservation

5.6.1 The Conservation department prioritises treatment by continual assessment of several relevant factors. Physical deterioration of a painting is given the highest priority. Other important factors include the curators' priorities, the display of the Collection, the Gallery's exhibition programme, the presentation of new acquisitions, and the need for paintings to be visible enough to identify and catalogue.

5.6.2 Remedial work is undertaken to prevent the need for more major intervention and includes minor treatment such as blister laying, surface cleaning and revarnishing.

5.6.3 Cleaning is undertaken for a variety of reasons. It is often a prerequisite of successful lining, panel work or the treatment of loose paint. The removal of discoloured varnish, retouchings and of overpaint so that the artist's original intentions can be seen is a second reason for cleaning, and is often associated with establishing a correct attribution.

- 5.6.4 Structural treatment of wooden or canvas supports is sometimes undertaken together with cleaning, or independently, usually for reasons of long-term preservation.
- 5.6.5 Proposals for major cleaning and restoration of paintings are discussed by curatorial and conservation staff, the Directors of Collections and Research, the Head of Conservation and Keeper, and the Director.
- 5.6.6 Except in an emergency, all proposals for major conservation work are referred to the Board of Trustees, both for permission to begin and, on completion, for approval of the work done and for the painting's return to display.
- 5.6.7 All minor work is discussed with and agreed by the relevant curator and approved by the Head of Conservation and Keeper, but not presented to the Board of Trustees.
- 5.6.8 Conservation of paintings is carried out by members of the Conservation Department. External specialists occasionally are engaged by the Head of Conservation and Keeper for material classes of object (more usually from the contextual collection e.g. works on paper) or technical issues outside the professional experience of the Department members. Such contractors will have previous relevant experience and good working knowledge in their specialism as determined by the Head of Conservation and Keeper.
- 5.6.9 Each painting in the main Collection has a Conservation Dossier. Reports are always written before and after treatment including dates and who carried out the treatment. Photographic and technical imaging record the treatment before, during and after. The Dossiers are labelled with the relevant inventory number. All conservation work is carefully monitored. The Dossiers are available to the public on request.
- 5.6.10 Curators update the Curatorial Dossiers with information gained as a result of conservation and scientific research e.g. new dates or attributions, techniques used by the artist.
- 5.6.11 The Scientific department is key to the conservation process as analysis directly supports treatment decisions, documentation and research into conservation materials and methods undertaken through, for example, technical examination and paint sampling analysis
- 5.6.12 Conservation or restoration will not be carried out to objects that do not belong to the Gallery without written permission from the owner and consultation with Arts Council England or relevant insurance providers. A treatment proposal will be provided and agreed.
- 5.6.13 The exception to this is where it is manifest that immediate structural, consolidation or other treatment is necessary to prevent further damage or deterioration. The Gallery will, where possible, consult the owner before proceeding.

5.7 Risk management

5.7.1 Historic paintings are both structurally and materially complex. It is a physical reality of the material nature of paintings that these objects are vulnerable to change and damage as a consequence of exposure to a variety of damaging causes. Most of these factors, under usual circumstances of display, can be described as 'environmental' in origin.

5.7.2 The principal risks associated with the care of collections and conservation of paintings, and as a consequence of not applying a preventive conservation strategy are:

- failure to preserve the Collection thereby failing to comply with the Gallery's primary statutory obligation;
- breach of statutory responsibility to care for and preserve the Collection;
- compromised visitor experience of paintings that are not displayed as close to the artist's intentions as possible;
- damage to paintings during conservation work;
- reputational impact of failure to properly care for the Collection and/or of controversial conservation treatment.

5.7.3 Risk mitigations are put in place with a view to minimising these risks.

5.8 Control of exposure to light and UV radiation

5.8.1 The Gallery has a Lighting Policy with associated lighting guidance documentation to support:

- The level of daylight and supplementary light from artificial lighting systems is controlled. The aim is to limit the annual exposure of the paintings to light to a prescribed level set at a value not to produce visibly detectable light damage to paintings over considerable periods of exposure.
- Daylight is controlled using mechanised external blinds, which open and close in response to outside light levels and, for the most recent systems, respond also to the position of the sun in the sky.
- Ultraviolet light content of a light source whether natural or artificial is rigorously reduced to extremely low levels, and preferably eliminated entirely. Filters are applied to glazing (any windows or rooflights) and to sources of artificial light.
- The Gallery maintains a programme of long-term colour measurement on pictures which has shown the necessity to control light levels for preservation.
- Light exposure is limited as much as possible, consistent with the public viewing requirements.

- 5.8.2 All Collection objects have been categorised into one of five 'light categories' which are recorded in the Gallery's Collection Management System. The majority of the Collection objects fall into the low or medium light sensitivity categories for which the current specifications are:
- **Low Light Sensitivity:** 140 - 160 lux (UV radiation content now specified as less than 10 μ W/lumen; formerly 75 μ W/lumen), annual light exposure limit: 600 kilolux hours;
 - **Medium Light Sensitivity:** 40-50 lux (UV radiation content now specified as less than 10 μ W/lumen; formerly 75 μ W/lumen), annual light exposure limit: 150 kilolux hours.
- 5.8.3 Light levels on the paintings' surface are monitored and the data collected and logged on the Gallery's environmental database for analysis and archive purposes.
- 5.9 Control of relative humidity and temperature levels and variations
- 5.9.1 Stability in relative humidity and temperature are the most important conditions for paintings, extremes of either are damaging. Wood panels are more vulnerable to fluctuating relative humidity due to their greater propensity for movement.
- 5.9.2 The safest means of eliminating these damaging changes is to stabilise the microclimate around paintings, and particularly to stabilise relative humidity at suitable levels.
- 5.9.3 The Gallery's air-conditioning system (the BMS) controls relative humidity and temperature, and generally removes atmospheric pollutants by air filtration.
- 5.9.4 The BMS ensures a stable level of relative humidity in the region of Relative humidity: 55 \pm 5 %; Temperature 21 \pm 1°C (winter); 23 \pm 1°C (summer).
- 5.9.5 Relative humidity can be further controlled in an enclosed space using electrically-powered, free-standing humidifying/dehumidifying units, which are deployed as needed.
- 5.9.6 If required, local environmental control for a particular painting is provided by microclimates in the form of marvelsealed packages, microclimate frames or conditioned display cases.
- 5.9.7 The environment is monitored and RH and Temperature data is collected and logged on the Gallery's environmental database for analysis and archive purposes.

5.10 Exclusion of pollutants

- 5.10.1 There are two principal types of common air pollutants, other than particulates – acidic (SO₂ and NO_x) and oxidising (ozone).
- 5.10.2 Temporary sources of ‘volatile organic compounds’ from building works, building maintenance, cleaning and from Gallery installations, are also assessed on a case by case basis, but not measured or monitored.
- 5.10.3 Active carbon filters in the ducting of installed air-conditioning plant removes these gaseous pollutants very effectively; other filters remove dust.
- 5.10.4 Measures are taken to reduce chloride-bearing salt pollution in the Galleries during the winter arising from external gritting and de-icing operations. Chloride ion is implicated in the discoloration of certain paints.
- 5.10.5 Dust monitoring is undertaken when required e.g. during construction work

5.11 Control of pests and mould

- 5.11.1 There are several species of moth, beetle and silverfish which can cause damage to paintings, frames and archival material.
- 5.11.2 The Gallery has an integrated pest management (IPM) policy which sets out the key requirements to protect the collection from damage cause by pest and mould. These include:
- Daily cleaning and regular less frequent deep cleaning of all spaces, both collection and back/front of house.
 - Rigorous monitoring programme to identify pest ingress, track and prevent infestation and where necessary apply control measures.
 - Potential for mould outbreaks is monitored and controlled by regular inspection and maintaining appropriate environmental measures.

5.12 Control and or exclusion of impact damage, shock and vibration

- 5.12.1 Paintings can be physically damaged by impact, shock, vibration and sound-induced vibration. The effect of exposure to vibration is cumulative and depends both on intensity and duration.
- 5.12.2 Barriers and glazing are engaged as a means of protection from impact damage.
- 5.12.3 Appropriate display and storage methods are employed.
- 5.12.4 The loans programme, including transportation is supported by targeted research and proven mitigation methods such as the provision of couriers, specialist transport companies and packing materials and methods.

- 5.12.5 Vibration monitoring and vibration criteria are used to limit the risk from vibration and sound-induced vibration for Collection objects on the Gallery estate e.g. from construction work, and guidelines are in place for events involving music and dance.
- 5.12.6 Current research is establishing vibration pathways, types of damage, approaches to mitigation and potential safe (if any) limits of exposure.
- 5.12.7 Policies and procedure (which are in constant review) support activities around the collection and protect it from incidents of shock and vibration.
- 5.13 Condition checking
- 5.13.1 The whole Collection, including works in store, is checked twice a year, and fragile panels at least six times by the Conservation Department and condition reports generated and retained. Formal notification of this process is given to the Head Conservation and Keeper. Long loans in are checked on the same schedule.
- 5.13.2 Loans to the Gallery's exhibitions are checked at start/end by gallery or conservator engaged by the Gallery.
- 5.13.3 Paintings requested for loan are checked for fitness to travel. If the loan is agreed, the painting is checked again before its departure and on its return. They are also checked at each key stage at the borrowing venues.
- 5.13.4 Long-term loans out from the Collection are checked at least every three years by Gallery conservators.
- 5.14 Conservation treatment
- 5.14.1 Technical images (including X-radiographs, infrared reflectograms and macrophotography) are used, when appropriate, for examination and recording before, during and after treatment. This is carried out by the Scientific, Conservation and Photography and Imaging departments using specialist equipment.
- 5.14.2 Scientific examination and analytical imaging are used when appropriate before and during cleaning to inform and guide the process of conservation. When necessary, the Directors of Science, Collections and Conservation will meet to decide on a particular course of treatment. These discussions are documented.
- 5.14.3 When a painting is undergoing treatment, the curator and conservator directly involved will regularly review and discuss the progress of the work, and if necessary, seek advice from other Gallery staff and from scholars outside the Gallery.

- 5.14.4 The Board of Trustees will be shown paintings during treatment if complex issues arise.
- 5.14.5 All materials, methods and equipment used in conservation are selected for permanence, reversibility, safety and other necessary qualities.

- 5.15 Acquisitions
 - 5.15.1 All potential acquisitions are examined by Conservation Department staff. The condition assessment will be presented to the Board of Trustees with the Acquisition Proposal.

- 5.16 Training and induction
 - 5.16.1 It is the aim of the Gallery to induct all new staff and contractors who will engage directly with the Collection of the controls, behaviours, policies and procedure in place to protect the Collection from harm, these include, for example, raising awareness of the impact of activities on the physical condition of the Collection and the range of policy and guidance documentation to support this such as the Policies and Procedures for the National Gallery Event Contractors, General Conditions for Buildings Contractors, Music and Dance at the Gallery, Materials and Equipment Permitted for Use etc.

Appendix 1: Definitions

AD: audio description.

aggregator: a system or resource that takes data from multiple sources, and makes it available as a seamless whole. Examples include Europeana, Art UK (q.v.) and the Museum Data Service (q.v.)

Art UK: an aggregator (q.v.) that publishes online every easel painting in a publicly accessible collection in the UK – along with a growing number of sculptures and other works of art. See <https://artuk.org/>.

BMS: Building Management System, the automatic centralised control of a building's heating, ventilation, air conditioning, electrical, lighting, shading, access control, security systems, and other interrelated systems.

BSL: British Sign Language.

CIDMP: the Gallery's Collection Information Data Management Plan.

CIDOC: the ICOM International Committee for Documentation. See <https://cidoc.mini.icom.museum/>.

collection: the total body of items, or part thereof, held by a collecting organisation; in the case of the Gallery, the main (q.v.), contextual (q.v.) and frame (q.v.) collections combined.

collection access: the right, opportunity or means of finding, using or approaching items and/or information about items.

collection care: a range of activities intended to safeguard a collection. These activities can include organisational policies, security, storage, cleaning, maintenance, handling, scientific investigation, environmental monitoring and control, exhibitions and loans, conservation, provision of surrogates and emergency planning.

collection information: the information that the organisation collects, creates, holds and maintains about its collection and/or collected items.

collections management: a range of activities closely related to collection care (q.v.), involved in the safety and protection of a collection. Collections management ensures that standards and procedures, legislation and ethical standards are met and the collection (q.v.) develops in line with museum policy and these requirements.

collections management system: a computerised system for managing the information about museum objects, combining both identification / cataloguing information, and the information needed to manage specific procedures such as location and movement control or loans in and out. At the time of writing, the Gallery uses TMS, supplied by Gallery Systems.

Collections Trust: an Arts Council England Investment Principles Support Organisation that helps museums work with the information that connects audiences and collections, and develops documentation and collections management standards, notably *Spectrum: The UK Collections Management Standard*. See <https://collectionstrust.org.uk/>.

Conservation Dossiers: the Gallery's primary record of treatments and scientific investigations carried out on paintings between 1955 and the present day, in the form of large, heavy 24-page fascicles into which photographs, reports, etc. are pasted.

contextual collection: Objects related to the history of the Gallery or its collection, including contemporary works of art commissioned by or for the Gallery, architectural sculpture, historic furniture, designs for or representations of the Gallery, etc. Although owned by the Gallery, these objects are not part of the Gallery's core collection of paintings in the Western European tradition, c.1250-c.1900, and therefore are not subject to the terms of the Museums and Galleries Act 1992. Acquisitions into the contextual collection are made according to the Gallery's Contextual Collection Policy, which also governs its management.

COPE: Create Once, Publish Everywhere (q.v.).

Create Once, Publish Everywhere: a broadly understood principle (albeit not formally documented) whereby resources, once created, should not be duplicated across systems, but made available seamlessly to all consuming systems from a single access point.

Curatorial Dossiers: what in other museums would be called 'history' or 'object' files, a compendium for each object of material relating the object and its history before and after it entered the collection, containing photocopies of catalogue entries and articles, offprints, correspondence and photographs. A project which ran between 1993 and 2004 systematically reviewed, expanded and listed the contents of about half the Dossiers, adding lists of bibliographic and archive references, exhibition histories, related works, etc. However, the Dossiers have not been maintained systematically since the Gallery's Dossier Assistant post was frozen in 2011.

endpoint: a digital location – often a URL (q.v.) – to which software can address queries in the expectation of receiving a response, usually some kind of data.

environmental conditions: relative humidity, temperature, light levels, pollution both gaseous and particulate, vibration and pest control.

exhibition loans in: objects, not owned by the Gallery, that have been lent for display in one or more temporary exhibitions. They are subject to a full loan agreement, drawn up with the lender. (For loans for displays amongst the main collection, see 'long loans in'.)

FAIR Principles: a set of principles governing the publication of open research data so that it can be actionable by machines as well as humans, by making it Findable, Accessible, Interoperable (q.v.) and Reusable.

Frame Dossiers: what in other museums would be called 'history' or 'object' files, a compendium for each frame of material relating the frame and its history before and after it entered the collection, containing copies of catalogue entries and articles, offprints, reports, correspondence and photographs.

frame collection: frames for Gallery paintings. Although owned by the Gallery, these objects are not part of the Gallery's core collection of paintings in the Western European tradition, c.1250-c.1900, and therefore are not subject to the terms of the Museums and Galleries Act 1992. The great majority are owned by the Gallery, but a few are lent from other institutions.

Frame acquisitions are made according to the Gallery's Frames Policy, which also governs its management.

intellectual access: making available information about objects and specimens through exhibitions, catalogues and other publications in paper, and/or electronic formats and photographic media, and access to supplementary information about the collections (q.v.)

interoperability: the ability of different computer system to share and use data between them; this in turn requires that data adhere to agreed standards so that it can be understood and processed.

Inventory: 'Inventory of pictures acquired by the National Gallery', National Gallery Archives NG2, de facto the Gallery's accession register.

Linked Data: structured data which is interlinked with other data, facilitating the sharing of information in a way that can be read automatically by computers, and so enabling researchers and systems to work with data from multiple sources at the same time.

long loans in: objects, not owned by the Gallery, that have been lent for display amongst the main collection rather than in a temporary exhibition. They are subject to a full loan agreement, drawn up with the lender. (For loans for exhibitions, see 'exhibition loans in'.)

main collection: objects which are owned by the Gallery, and are managed subject to the terms of the Museums and Galleries Act 1992. They form the Gallery's core collection of paintings in the Western European tradition, c.1250-c.1900. Acquisitions into the main collection are made according to the Gallery's Collection Development Policy.

Manuscript Catalogue: 'National Gallery Manuscript Catalogue', National Gallery Archives NG10, a catalogue and record of treatments of paintings, maintained from 1855 to 1954.

middleware: software that sits between source data management systems and consuming / publication systems, aggregating (q.v.) data and rendering it seamlessly available from consistently-formatted endpoints (q.v.) At the time of writing the Gallery uses the CIIM (Collections Information Integration Middleware), supplied by Knowledge Integration.

Museum Data Service: an aggregator (q.v.) that aims to assemble connect and share all the object records across all UK museums, large and small. See <https://museumdata.uk/>.

Object ID: an internationally-recognised documentation standard for identifying and recording cultural goods, with a particular focus on identification in the event of theft or looting. See <https://icom.museum/en/resources/standards-guidelines/objectid/>.

persistent identifier: a digital identifier which resolves to either a digital entity, or a digital description of the entity it represents, which will remain constant regardless of the URL (q.v.) at which the relevant entity or description is found at any given time.

physical access: access provided to collections (q.v.) through display, temporary exhibitions, and access to study and reference collections.

PID: see 'persistent identifier'.

preventive conservation: the management of the museum building, site and environment to achieve optimum conditions, including environmental monitoring and control, pest management, storage and display provision.

remedial conservation: an interventive technique applied to an item to achieve chemical and physical stabilisation for the purpose of extending the useful life of the item to ensure its continued availability.

research objects: objects that are neither owned by the Gallery, nor have been in its care, but for which the Gallery holds a record as a result of previous examinations, research projects, to provide context for objects in the collections, or for some other reason.

RH: relative humidity.

Scientific Files: the Scientific Department's working and historical analogue files.

temporary deposits: objects, not owned by the Gallery, that have been deposited in the Gallery for any of a number of reasons, excluding public display but including, for example, examination, photography, or treatment. They are subject to an agreement drawn up with the owner.

transferred objects: objects formally in the care of the Gallery as part of the main collection, but now transferred to the care of other institutions. Under the terms of the Museums and Galleries Act 1992, and previous legislation, the Gallery cannot deaccession objects; but it can transfer them to other national collections.

URI: Uniform Resource Indicator, a unique sequence of characters which identifies an abstract, physical or digital resource. URIs are fundamental to the functioning of Linked Data (q.v.) A URI that points to a digital representation of the resource is known as a URL; one that does not point to a digital representation of the resource is a Uniform Resource Name (URN).

virtual records: records in the collections management system (q.v.) that do not relate to a physical object as such, but serve to group objects together for intellectual reasons: for example, parts of one altarpiece, members of a cycle of paintings or decorative scheme, studies for the same painting.

Appendix 2: Legal and Ethical Basis

Collections management is subject to and therefore will be managed in accordance with the following legislation, ethical codes and sectoral standards:

Legal basis

- National Heritage Act 1980: Section 16 (as amended by the Museums and Galleries Act 1992)
- Part 6, Section 136 of the Tribunals, Courts and Enforcement Act 2007
- Charities Act 2011, Section 105 order 2019
- CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora), 1975
- Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property, UNESCO, 1970
- Copyright Act 1911 and 1956
- Copyright and Related Rights Regulations, 2003
- Copyright, Designs and Patents Act, 1988
- COSHH: Control of Substances Hazardous to Health Regulations, 2002
- Creative Commons license framework
- Data Protection Act, 2018
- Dealing in Cultural Objects (Offences) Act, 2003
- Disability Discrimination Act 1995 (as amended)
- The Environmental Information Regulations, 2004
- Equality Act, 2010
- The Fire Precautions Act, 1971
- Human Rights Act, 1998
- The Freedom of Information Act, 2000
- Health and Safety at Work Act, 1974
- HM Customs & Revenue
- Management of Health and Safety at Work Regulations, 1999
- Museums and Galleries Act, 1992
- Public Records Acts, 1958, as amended 1967
- Race Relations Act, 1976
- Racial and Religious Hatred Act, 2006
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, 1995
- Re-use of Public Sector Information Regulations, 2005
- Sex Discrimination Act, 1975

Ethical codes

- Code of Ethics for Museums, Museum Association, 2015

- Code of Ethics for Museums, ICOM, 2017
- Code of Practice on Archives for Museums and Galleries in the United Kingdom (third edition, 2002)
- Combating Illicit Trade: Due Diligence Guidelines for Museums, Libraries and Archives on collecting and borrowing Cultural Material, DCMS, 2005
- Statement of principles issued by the Museum Directors Conference on spoliation of works of art during the Holocaust and World War II period, 1998
- UK Export Licensing for Cultural Goods: Procedures and guidance for exporters of works of art and other Cultural Material, DCMS, issue 2, 2021

Sectoral standards

- The Bizot Green Protocol, September 2023, and accompanying handbooks
- Code of Ethics: ICOM-CC/ICON
- Code of Practice on Archives for Museums and Galleries in the United Kingdom (third edition, 2002).
- FAIR Principles
- Government Indemnity Scheme Guidelines, 2018
- Guiding Principles for Reducing Museums' Carbon Footprint, NMDC, 2009
- Institute of Conservation's (ICON) Conservation Register, 2013
- International Guidelines for Museum Object Information: The CIDOC Information Categories , CIDOC, 1995
- PAS 197:2009 Code of practice for cultural collections management
- PAS 198:2012 Specification for managing environmental conditions for cultural collections
- PD5454:2012 Guide for the storage and exhibition of archival materials
- Principles for Lending and Borrowing, National Museum Directors' Conference, 2021
- SPECTRUM: UK Museum Collections Management Standard, version 5.1, 2022
- Statement of Principles of Museum Documentation, CIDOC, 2012