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# Restitution Narratives in Museums: Framing, Legitimacy, and Global Power

Asiimwe Kyomugisha T.

Faculty of Business, Kampala International University, Uganda

## ABSTRACT

This paper examines how contemporary museums frame, justify, and respond to restitution claims concerning contested cultural heritage within an increasingly interconnected global landscape. Drawing on perspectives from memory studies, museum governance, political economy, and heritage studies, it explores the narratives that shape debates over the return of cultural objects acquired through colonialism, conflict, or unequal power relations. The study investigates how museums employ curatorial framing, institutional authority, and governance structures to construct legitimacy in restitution discussions while simultaneously negotiating competing historical memories and claims to ownership. Particular attention is paid to the role of narrative strategies, public pedagogy, audience reception, and digital transparency in shaping perceptions of restitution. Through comparative analysis of museum practices across different national and regional contexts, including Canada, France, New Zealand, and the United States, the paper highlights the influence of governance models, legal frameworks, and ethical commitments on restitution outcomes. It further examines the role of international organizations, cultural diplomacy, and transnational power relations in determining the terms of repatriation. The findings demonstrate that restitution debates extend beyond questions of property ownership to encompass broader struggles over memory, representation, identity, sovereignty, and global justice. The paper argues that museums function as important sites where historical injustices are acknowledged, contested, and potentially reconciled through inclusive and transparent approaches to cultural heritage governance.

**Keywords:** Restitution, Museum Governance, Cultural Heritage, Repatriation and Memory Politics

## INTRODUCTION

Anchored to restitution (the return of cultural property to those from whom that property had been taken) and to the contestation of memory, the leading question of this work concerns the ways in which contemporary museums respond to restitution claims [1]. Relevant elements from memory studies elaborate the theoretical framework, while political economy and an examination of museum governance contribute to further defining the scope of analysis. The conceptual concerns frame the approach by asking how museum practices articulate global power in regard to contested art and cultural heritage [2]. Contemporary museums worldwide rarely purport to support the return of contested artifacts; if such claims are granted, on the contrary, institutions often seek to influence the terms of the return. Examining specific cases from diverse global environments nevertheless indicates that museums with distinct genres of governance react differently to claims [3]. The resulting map invites further exploration of the reasons for divergent trajectories in these global restitution debates and the articulation of global power discourses that inform and shape them [1].

### Theoretical Foundations: Restitution, Memory, and Museum Governance

To understand museum restitution practices, it is important to differentiate among concepts of restitution, memory, and governance [2]. The term “restitution” encompasses legal, moral, and epistemic restitution, often expressed in relation to “stolen,” “looted,” or “colonial” art. The concept of memory addresses the memorialisation, commemoration, or remembrance of past events [3]. Lastly, museum governance refers to the systems of

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management that determine the policy-making responsibilities of museums [3]. Museum restitution and related claims are frequently described as global issues in the sense that they represent, as it has been put, a collective and international concern of societies regarding aspects of their past. These societal concerns are linked to both political transitions in a wide variety of national contexts and new international arrangements that have fostered transnational or global governance [3]. Changes to the governance of restitution and the resurgence of claims on all continents are bound up with broader shifts in political organisation and the transnationalisation of governance surrounding the restitution of cultural heritage. Contemporary debates about restitution involve contested narratives of memory tied to events where large-scale suffering, injustice and violence are perceived to have occurred, such as genocides and destructive state-led policies [1]. The scholarly literature further suggests a close connection between restitution and museum governance, especially since the extent and scope of museum governance is a major determinant of the scale and ambition of restitution practices [2].

### **Framing Restitution: Narrative Strategies and Curatorial Choices**

The design of exhibitions strongly influences how the narratives being presented are interpreted and understood by the audience. The inclusion of other terms within the narrative, such as 'art', 'science' or 'history', helps to further influence the audience understands as these often-implicit statements affect how the knowledge is conceived [4]. Objects, when presented in exhibitions, are surrounded by a range of descriptive elements that provide contextual information about them, framing them as objects of interest; the language and concepts employed in these descriptions influence the knowledge imparted to the audience and, ultimately, the authority which is attributed to the information conveyed [3]. When curating exhibitions, the concept of voice represents a fundamental aspect that ivory tower academics often overlook: the narrative supplies the point of view from which the case is articulated; the way things are presented, intentionally or unintentionally, imply the surrogate "I", the intention of the message and who is addressing it; the articulation of voice is a distinguishing element of any narrative, whether written or imagined [3]. The idea of framing, in the sense of denoting how information and knowledge is prepared, allows for a precise understanding of the topic of the restitution negotiations. Framing, however, refers to more than merely indicating the subject of conversation; framing describes how the argument is structured, whose views or opinions are being voiced, and which are silenced as well [4]. Curatorial framing embraces the selection of particular objects together with the surrounding commentary and information offered in labels, captions, audio-visual documentation and catalogues, which altogether constitute a curatorial narrative [1].

### **Legitimacy and Authority in Restitution Debates**

Museum professionals involved in restitution discussions and decision-making address significant issues of legitimacy and authority [3]. Legitimacy may be framed juridically, morally, or epistemically, while authority may be traced legally to ownership, historically to colonial and imperial domination, or administratively to contemporary governance systems. Stakeholders frequently stake claims to the legitimacy of their positions and the authority of the institutions they represent [6]. Claims to procedural legitimacy associated with the original acquisition of objects are also common in the restitution debate [7]. Yet the legitimacy and authority to speak on restitution issues are far more complex than the administrators and institutions involved may be willing to acknowledge. Public museums in national states tend to represent the claims made by local stakeholders to both legitimacy of position and authority to speak on behalf of objects acquired by colonial means [8]. The authority to speak is contested along lines of epistemic framework and capacities for storytelling. The constitution of legitimate voice, to whom the museum should listen and therefore whom it represents, facilitates the positioning of either the institution or the museum profession itself as authority in matters of governance and decision-making [2]. Consequently, mechanisms for assessing the credibility and restitubility of claims have emerged. Key factors shaping these evaluations include the historical period during which objects were acquired, the nature of acquisition processes, the purpose of establishment and expansion, and the roles played by colonial and non-colonial modes of expansion [9, 1].

### **Global Power and the Politics of Repatriation**

Questions of global power, imperial legacies, and transnational governance pervade the restitution discourse. The art market's growth, museum acquisitions, and the international movement of cultural objects, fostered by treaties such as the 1970 UNESCO Convention, establish a destructive cycle within the restitution narrative. Cultural diplomacy and soft power architecture extend beyond art to incorporate allegiances formed through supplementary memoranda [5]. China's Belt and Road Initiative proposes the ultimate partnership by intertwining the movement of cultural objects with global positioning on trade, technology, and development, not through a singular restoration focus, but in its fabrication of an unprecedented multilateral frame for international relations [2]. Internationally, four transnational restitution frameworks, the UN, UNESCO, the EU, and INTERPOL, occasionally interject in the formal restitution narrative; however, this recourse still remains limited at best [3]. International organizations adopt a fundamentally different approach to the objects involved,

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addressing movement rather than restoration. Simultaneously, the art market's growth feed the acquisition cycle amid the maintenance of existing momentum [4]. Movement still occurs, yet the emphasis of the dominant formal narrative regarding a singular restoration remains unaddressed [5]. Issues stemming from the prominence of the claim remain politically salient; the interdiction of claims following prior settlements remains (allocation among sub-national assemblies) whereas the settlement of claims remains disruptive, yet the politics thereof already derive concerning the abatement of claims [6].

#### **Case Studies: Regional Contexts and Museum Practices**

Despite variations in political contexts, restitution claims have become emblematic of broader decolonial battles, frequently associated with efforts to reclaim indigenous land and sovereignty [4]. Museums in diverse countries govern ethnographic collections resulting from colonial activities and engagements with indigenous communities. Significantly, institutions in four regions (Canada, France, New Zealand, and the United States) have adopted distinct positions and approaches toward restitution across comparable institutional frameworks [3]. Canada and New Zealand exhibit fully-developed official restitution policies constituting modes of governmental partnerships; the United States likewise embraces assignments within delegated policies, yet fuses federal provisions with soft-power mechanisms; France engages with ethnographic-material claims through comprehensive legal frameworks despite a notable absence of state-governed restitution [4]. These regional distributions amplify considerations targeting fundamental distinctions between museum governance and restoration practices. Priorities dictate whether museums act as restoration facilitators accompanying governmental processes or maintain stringent curatorial independence from the political realm [5]. Thus, an analytical palette emerges centered on governance and restitution practices within comparable nation-states, encompassing cultural-material access coupled with restitution claims [6]. Overall, museum governance remains pivotal to museum development, informing narratives and decisions addressing restitution and broader societal inquiries through the character of permanent collections, exhibition modalities, and formats employed for discussion and mediation [2, 5].

#### **Ethics, Law, and Policy: Frameworks Shaping Restitution**

Frameworks for addressing restitution derive from ethics, law, and policy, interlocking fields that shape museum narratives [2]. Ethical principles and values are enshrined in professional codes and voluntary agreements. International law instruments acknowledge the right of memory and provide a legal basis for museum practice. National laws govern stolen property, cultural treasures, and intangible heritage [3]. Public policy, supplemented by statements at global forums, reflects the restitution agenda. The 1970 UNESCO Convention prompted countries to implement cultural property protection legislation and reformed museums' role in acquisitions [2].

International human rights instruments issued since 1948 affirm the right to cultural identity and foster memory rights at the international level. In addition to the right to memory, general human rights norms, guaranteeing property protection, security of the person, and cultural expression, impose obligations [3]. Instruments promoting freedom of information, expression, and the inviolability of private property can also be invoked. Such principles are binding only on signatories [6]. Professional codes of ethics and guidelines of international museum associations that further endorse these concepts urge the return of illegally acquired items deemed cultural property.

#### **Audience Reception and Public Pedagogy**

Museums in relation to restitution have the potential to act as mediators in public debates and build bridges between groups in conflict [7]. Museums can, for instance, frame restitution as a means of reconciliation with colonial histories. Museums engage with contested stories that raise questions of power and representation to varying degrees. In curatorial settings, the perspective and authority of exhibitors, narratives, and the design of exhibitions play a crucial role in how these controversies are communicated and understood [8]. The museum's role in broadening narratives depends on curatorial strategies and choices that influence the nature of engagement. Audience interpretations have a significant bearing on the impact of restitution narratives. Audience research carried out broadly across museum sectors has uncovered the effect of exhibition content on visitors' understanding of debates and conflicts. Frame analysis shows that museum frameworks provide crucial influencers when visitors connect socially and conceptually to exhibited content [8]. Furthermore, the notion of public pedagogy fits closely with the aim of restitution framing. Public pedagogy foregrounds the importance of more than just the content of exhibitions and encapsulates the educational ambitions of museums engaging controversial subjects such as restitution. Similarly to museums, the educational mission applies to various institutions and underlines a pedagogical approach that extends beyond learning outcomes [9]. Epitomising central aspects of educational theory, the distinction delineated between affective and epistemic gains is helpful, particularly in relation to restitution and narrative expectations. Moreover, characteristics conducive to the gauging of learning outcomes positively resonate with the complementary public pedagogy concept [8]. Unlike formal education, which seeks to determine achievable learning goals, messy public pedagogy embraces a shift of emphasis toward

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potential outcomes. Although audience interpretations, effects, or gains may be difficult to envisage in advance, certain audience attributes may nevertheless be indicative of possibilities. Institutions seeking to map audience learning can wish to outline professional aspirations concerning educational outcomes rather than formalised goals[9].

### **Digitalization, Transparency, and Inclusive Storytelling**

Many museums have introduced dedicated online platforms for repatriation claims, facilitating tracking and highlighting of restitution efforts [8]. A review of such projects reveals efforts by institutions such as the John F. Kennedy Presidential Library and Museum, the Los Angeles County Museum of Art, and the Smithsonian's National Museum of the American Indian to communicate choices surrounding the preservation and organization of their content. Various approaches to provenance are available, each allowing different levels of viewer involvement [7]. Some projects prioritize accessibility by presenting written responses to audience questions, whereas others convey issues through infographics or video commentary, creating spaces for alternative interpretations [8]. Such transparent yet directed curation encourages reciprocal storytelling relevant to both institutional and personal narratives [9].

### **Challenges, Risks, and Future Directions**

Contemporary restitution narratives in museums address a range of complex challenges. Methodologically, many museum professionals, critical heritage scholars, and practitioners adopt a reflexive approach to restitution issues and related policy development to explore how these initiatives may shape socially engaged and culturally responsive practices [5]. Ethical frameworks, legal regulations, political perspectives, and institutional policies continue to evolve regarding cultural property rights, ownership, provenance, and the decolonization of collections [6]. The legally binding instruments developed by UNESCO and the UNIDROIT lay down universal principles and guidelines for measures to be taken to protect cultural property and promote the intended return and cultural objects[7]. International legal and political constraints pose diverse challenges to museum practices and the development of coherent restitution policies [8]. Opportunities to enhance curatorial practices arise in dialogue with indigenous communities about sensitive matters and ongoing research on archival materials and ethnographic collections acquired under dubious circumstances [2]. The empirical patterns, shared experiences, custodial legacies, spatial imprint of collections, historical context of their acquisitions, and curatorial decisions influence the eligibility of restitution requests and negotiations of claims on a case-by-case basis[9]. Further research and outreach clearly remain required to ensure that these efforts are sufficiently interpreted as securing the return of the collected objects [4].

### **CONCLUSION**

Restitution debates have emerged as one of the most significant challenges confronting contemporary museums, compelling institutions to reconsider their roles as custodians of cultural heritage, producers of historical knowledge, and participants in global power structures. As this study demonstrates, restitution is not merely a legal process concerning the transfer of ownership but a deeply political, ethical, and epistemic practice shaped by competing narratives of memory, legitimacy, and authority. Museums play a critical role in framing restitution through curatorial choices, exhibition design, institutional policies, and public engagement strategies. These narrative practices influence how audiences understand the histories of acquisition, colonialism, dispossession, and cultural belonging associated with contested objects. The authority to interpret and represent these histories remains unevenly distributed, often reflecting broader historical and geopolitical inequalities. Consequently, debates over restitution frequently become debates over who has the right to speak, whose memories are recognized, and whose claims are considered legitimate. The comparative examination of museum practices across different national contexts reveals that governance structures significantly influence restitution outcomes. Institutions operating within collaborative and community-oriented frameworks tend to adopt more responsive and inclusive approaches than those emphasizing curatorial autonomy or restrictive legal interpretations. At the international level, organizations, treaties, and cultural diplomacy initiatives continue to shape restitution discourse, although significant disparities in power and resources remain evident. Digital technologies, transparency initiatives, and inclusive storytelling practices offer promising avenues for expanding participation in restitution debates and fostering greater accountability. Nevertheless, substantial challenges persist, including legal constraints, contested provenance histories, political sensitivities, and divergent understandings of justice and cultural ownership. Addressing these challenges requires ongoing dialogue among museums, source communities, governments, international organizations, and the wider public. Ultimately, restitution should be understood as a process of historical reckoning and relationship-building rather than solely the return of objects. By embracing transparent governance, ethical responsibility, and inclusive forms of storytelling, museums can contribute to the redress of historical injustices and promote more equitable and culturally responsive approaches

to heritage stewardship. In doing so, they can transform restitution from a site of conflict into an opportunity for reconciliation, mutual recognition, and global cultural justice.

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