



Combating Illicit Trade:

**Due diligence guidelines for museums, libraries and
archives on collecting and borrowing cultural material**

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1. Introduction

There is general agreement within museums, libraries and archives that the illicit trade in cultural material must be resisted, that they should set high ethical standards for acquisitions and that they should avoid giving tacit support to the market in unprovenanced material through their acquisition activities. There is, however, much ethically acceptable material on the market, and for many reasons it is vitally important that museums, libraries and archives continue to be able to develop their collections.

New acquisitions inform, entertain and inspire visitors, encourage new audiences and raise the profile of the institution (and of all of those bodies involved in the acquisition). They provide an impetus for research and can play a vital role in education, outreach and training. The process of acquisition in itself can be an important stimulus and catalyst for other processes within and between institutions.

Museums, libraries and archives must take precautions to ensure that they acquire, or borrow, only ethically acceptable items and reject items that might have been looted or illegally exported. To ensure they do this, they need to exercise due diligence. The following guidelines explain what that entails.

These guidelines have been produced by a sector-wide working group established under the auspices of the Department for Culture, Media and Sport's Illicit Trade Advisory Panel.

The sector-wide working group was made up of representatives from the following organisations:

The Department for Culture, Media and Sport, the Museums, Libraries and Archives Council, the Museums Association, the National Art Collections Fund, the British Museum, the V&A, the Ashmolean Museum, the Fitzwilliam Museum, the Society of Antiquaries of London, York Museums Trust, the Manchester Museum, the British Library and the National Archives.

These guidelines have been endorsed by The Museums Association, The National Art Collections Fund, The Museums, Libraries and Archives Council (including the MLA/V&A Purchase Fund), The Society of Archivists, Chartered Institute of Library and Information Professionals, The National Fund for Acquisitions (Scotland), Society of Museum Archaeologists. The funding bodies expect museums to adhere to these guidelines when applying for funding for acquisitions.

2. Scope of guidelines

These guidelines aim to assist museums, libraries and archives when considering the acquisition by purchase, gift or bequest of items of cultural property originating outside the UK. The guidelines apply to museums, libraries and archives, but it is anticipated that museums will need to refer to them more often. For the sake of brevity, the term ‘museum’ is used throughout but should be taken to include libraries, archives and galleries.

They also apply to inward loans. They apply equally to contemporary material from those countries that restrict its trade or export. They apply to items of UK origin that may have been illicitly excavated or illicitly removed from a building, monument, site or wreck. They do not, however, cover the specific factors relevant to natural science material or any other material covered by CITES¹.

The guidelines aim to help museums to ensure that they reject illicit material. They do not cover other aspects of the acquisition process, such as checking whether the item falls within the institution’s acquisition policy or that it has not been stolen. They should be used in conjunction with documents such as Spectrum (the Museum Documentation standard), the Museums Association Ethical Guidelines on Acquisition and the National Museum Directors’ Conference Spoliation Guidelines.

The details of these guidelines apply to museums in England and Wales, and the general principles apply to museums elsewhere.

The guidelines are provided as an information guide only. They are not a full and authoritative statement of the law and do not constitute professional or legal advice.

No responsibility is accepted by the working group, the Illicit Trade Advisory Panel, or the Department for Culture, Media and Sport for any errors, omissions or misleading statements in these guidelines. In particular it must be noted that although the working group, the panel and the DCMS have made every effort to ensure that the information set out in this document is correct at October 2005, changes in the law may mean that the guidance given in these guidelines becomes gradually less accurate. While every effort has been made to ensure the accuracy of statements found in these guidelines responsibility is not accepted where information is inaccurate.

¹ Accredited museums that acquire natural science material will need to take account of this as part of their acquisition policy; see paragraph 8d of the specimen acquisition and disposal policy in MLA accreditation guidelines.

3. Basic Principles

Museums should acquire and borrow items only if they are legally and ethically sound. They should reject an item if there is any suspicion about it, or about the circumstances surrounding it, after undertaking due diligence. Documentary evidence, or if that is unavailable an affidavit, is necessary to prove the ethical status of a major item. Museums should acquire or borrow items only if they are certain they have not been illegally excavated or illegally exported since 1970.

The 1970 threshold

The 1970 threshold is a clear, pragmatic and practicable watershed that is already widely understood and supported. However, museums also need to be fully aware of the implications of any legislation, in the UK or the country of origin or an intermediate country, that might apply to the period before 1970

1970 is generally accepted as the key point for an ethical approach to museum acquisitions in this area because:

- in 1970 UNESCO adopted the *Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Cultural Property*. The 1970 Convention transformed the ethical landscape of the museum world.
- in 1998 the British Museum published its statement on the acquisition of antiquities in which it stated its commitment to avoid acquisition of unprovenanced antiquities appearing on the market after 1970. This was reinforced in the same year by a similar resolution by the Council of the British Academy.
- in 2000 the UK government stated its support for the 1970 threshold. In a response to the House of Commons Culture, Media and Sport Committee it stated 'The Government endorses the broad principle that museums should avoid acquiring any item that has no secure ownership history, unless there is reliable documentation to show that it was exported from its country of origin before 1970, or the museum is able to obtain permission for the acquisition from the relevant authorities in the country of origin.'
- the Museums Association Code of Ethics, published in 2002, also includes the 1970 threshold.

4. What to do when considering the acquisition or loan of an item

The first step is to ensure that checks on provenance are carried out as soon as a potential acquisition is identified. Museums must be able to establish where an item came from, and when and how it left its country of origin and any intermediate country.

At the outset of any negotiations it is important to inform the vendor, donor, or lender that museums are unable to acquire or borrow items unless due diligence has been satisfactorily undertaken.

For an item originating outside the UK

The museum must either:

- be certain and have evidence that the item was in the UK before 1970 and have no reason to suspect it was illegally exported from its country of origin

or

- be certain that the item was out of the country of origin (but not in the UK) before 1970 and have evidence that its subsequent export to the UK was in line with the regulations of the country from which it was exported to the UK

or

- be certain that the item was in its country of origin after 1970 and have evidence that it was legally exported in line with the regulations of the country of origin

In order to do this, the museum should ask the vendor or donor to provide documentary evidence verifying the presence of the item in the UK prior to 1970, or confirming the legitimate export of the item to the UK after 1970. In the case of an auction sale, if the sale catalogue does not confirm that the item was legally exported or entered the UK before 1970 then the museum should ask for necessary documentary proof of provenance before the sale.

The museum needs to be fully aware of the implications of any legislation, in the UK or the country of origin or an intermediate country, that might apply to the period before 1970 and make every reasonable effort to ascertain that its export was not in violation of that legislation.

What constitutes acceptable evidence:

- Export licence from country of origin
- Publication in a reputable source prior to 1970, or at a date that proves its legitimate subsequent permanent export from country of origin

The following types of documents might also provide acceptable evidence that the item was legally exported, removed or excavated, or that prior to 1970 it was already in the UK:

- Will/inventory
- Photographic evidence
- Family correspondence
- Auction catalogue
- Excavation field notes

Beware fake documentation. If there is any doubt about the authenticity of a document, then consult with colleagues in the UK and, if possible, representatives of the country of origin. Do not accept a document if there are any suspicions about it.

For an item originating in the UK

See separate guidance below (section 10)

5. What to do if there are problems establishing the provenance:

If the vendor cannot provide acceptable documentary evidence of the item's provenance then it is the museum's duty to undertake due diligence. That is, to make every endeavour to establish the facts of the case before deciding its course of action.

At any stage of the due diligence process outlined below the museum may decide that there are doubts about the item's ethical status and it therefore cannot proceed with the acquisition or loan.

6. Due diligence – What it should involve

a) Initial examination of item:

Although it is not always possible, it is best practice to examine the item at first hand to determine, as the case may be, whether it:

- shows signs of certain types of ingrained dust, dirt or other accretions, or has annotations. If so it may have been displayed, used or stored for some years – so could be from an older collection.
- has a distinctive type of mount, mounting or binding that is likely to be from a particular period.
- has been mended, partially restored or otherwise interfered with. If so, it may be possible to decide whether the methods used are old or new and estimate when work was done.
- carries old labels, inscriptions, or other marks. These could offer clues about presence and/or use in former collections – but they might be forged, or if genuine, transferred from other items.
- in the case of archaeological material, still retains patches of fairly fresh-looking soil or encrustations, and may thus be recently excavated and so more likely to be illicit.

b) Consider the type of item and likely place of origin

If there is nothing obviously suspicious about the physical appearance of the item, then consider carefully the following factors:

- there are certain ‘hot’ areas from which items come on to the market illegally, i.e. areas where extensive looting is happening now or in the recent past; at the time of publication examples include Afghanistan, SE Asia and Iraq.
- there are some recognised classes of ‘red list’ item (cultural objects defined as ‘at risk’ by ICOM – see Appendix 1) that are extremely likely to be illicit; eg certain sorts of African, Latin American and Iraqi artefacts.

There is no single source of guidance on ‘hot’ areas and types of item but sources of information are suggested in Appendix 1. If there is any suspicion at all that the object under consideration

might fall into a 'red list' category, then extreme diligence and caution are required. It is important to bear in mind that certain categories of item have almost certainly been illicitly traded and that it is likely that these items cannot be legitimately acquired.

c) Take expert advice

In problematic cases, or in areas outside the museum's field of expertise, it is important to seek assistance and advice from specialists in appropriate national museums or museums with designated collections, or local experts – for example in the British or foreign schools of archaeology and in museums in the country of origin. Advice may be available from cultural attaches in embassies and high commissions or Unesco. Such experts can advise both about geographical areas, particular types of item and possible sources of evidence of provenance. Colleagues might also be able to provide informed opinion about the reputation of the owner of the object. However, expert advisers cannot be held responsible for the purchase itself or any consequences of it, and this responsibility remains with the purchasing institution.

d) Determine whether the item was lawfully exported to the United Kingdom

Check whether the export of the item was in line with the regulations of the country of origin, and other cultural property legislation applicable at the time the item was exported. If necessary seek legal advice and advice from the country of origin about whether the export of the item complied with legislation.

e) Evaluate the account given by the vendor or donor

In all cases, the account of the provenance (including export) of the item provided by the owner (whether private individual or dealer) is vital, and should be supported by documentation or other acceptable evidence, or failing that, a sworn statement (affidavit).

- The museum must decide whether the vendor/donor's story, supposing he/she claims to know its history, is convincing. The problem is often one of objective history blending with family folklore 'I think it belonged to my great aunt who was in Italy before the war.' The vague generic descriptions seen in sales catalogues like 'Property of a gentleman' or 'from a European private collection' are not acceptable proof of provenance.
- It is important to try to ascertain whether the owner's word can be accepted. If a member of the trade, is he/she a member of an appropriate and recognised trade association with a reliable Code of Practice? If the source or contact is not personally known to the museum, it might be advisable to consult a colleague who has had dealings with them before.

7. The results of due diligence

The due diligence process outlined above may raise doubts about the item's ethical status, in which case it cannot be acquired or borrowed. **In all cases if there is any suspicion whatsoever about the item, then you should not proceed with the acquisition.**

However, as a result of the due diligence process the museum may conclude that the item's ethical status is acceptable. In this case one of the following will apply:

- a) The vendor/donor gave a plausible account of the item's history and provided documentary or other acceptable evidence to support the provenance, proving that it was not illegally exported or excavated after 1970.
- b) The museum is clear that the item entered the UK prior to 1970, or was legally exported from the country of origin (and any intermediate country) to the UK after 1970, but there is no documentary evidence of provenance.

In situation b) the museum should ask for a sworn statement (affidavit), prepared by a lawyer, from the vendor or donor, or their agent, to confirm their account of the item's provenance.

In the case of major items the absence of documentary evidence, or an affidavit from the owner, donor or their agent, confirming their account of the item's provenance means that there must be doubts about the item's status, so it cannot be acquired or borrowed.

In the case of a minor item² instead of requiring an affidavit it is acceptable to record in writing the vendor/donor's account and ask him/her to sign it as a true account. Note that under the Data Protection Act the vendor/donor has the right to inspect records concerning them.

² Minor items

Many minor items appear on the market or are offered to museums with no acquisition history. This may be because they are illicit but it may equally be because none of their previous owners has ever thought it worthwhile to catalogue or record them, or to provide or keep receipts of purchase. There is also the possibility that documentary evidence of a legitimate provenance has been lost. The only satisfactory way to decide whether in individual cases it is ethically admissible to attempt to acquire such items is through the exercise of due diligence.

'Minor items' are not easy to define comprehensively, since most categories of material, from manuscripts and coins to porcelain and Greek vases, necessarily include both minor and major items. Nor is it appropriate to use financial value as the main criterion, since items which are very cheap and which may seem insignificant can have major archaeological and cultural significance. However, they share the following characteristics:

- may be of common types, or may be items of which multiple examples were made and have survived.
- are usually made of relatively cheap or plentifully available materials
- are often (but not always) small in physical size
- may lack conventional beauty or other appeal
- tend to be (but are not always) of relatively low monetary value

If a museum is unsure whether an item falls into the category of 'minor items' they should consult with colleagues from other institutions (see Appendix 1). They should ensure that the decision to treat an item as minor is fully recorded.

c) If the item is minor and the owner cannot provide a plausible account of its provenance and if it does not fall into any of the categories outlined above (e.g. freshly excavated, from a 'hot' area, or a 'hot' category of item), then the decision to accept or purchase the item is a matter for the judgement of the individual museum, having considered all the relevant points mentioned above. If the museum does embark on the purchase, it is the museum's responsibility to act openly and transparently and record the ways in which due diligence has been exercised. This is important not only in cases where funds are being sought for a purchase, but also to avoid potential future difficulties for the acquiring institution.

In all cases if there is any suspicion whatsoever about the item, then you should not proceed with the acquisition. If, after all necessary checks have been made, it is felt to be inappropriate to pursue the acquisition further, then the process should be closed formally, with all relevant documentation put on file. Note that under freedom of information requirements, the file may be open to future examination.

If a museum believes that a criminal offence has taken place they should report it to the police.

8. Specific permission from the country of origin, courts, etc

Under some government policies, laws or conventions there may be procedures that can give consent to museums to acquire an item that would otherwise be unacceptable under the law or convention, or retrospectively approve an export. In such cases it is vital that the museum obtains such consent in writing before acquiring the item.

9. Due diligence when acquiring collections

All items considered for acquisition or loan should necessarily be subject to the measures of due diligence outlined above. However, when assessing the suitability for acquisition of large collections of items particular issues arise. If a discrete collection is accompanied by documentation or acceptable evidence verifying its provenance, then acquisition of the collection is not a problem.

In the cases where there is no documentation for the entire collection, or where it relates only to some objects, or seems suspect, then each individual item in the collection should be subjected to exactly the same due diligence processes as any other individual item and acquired, or rejected accordingly. This is a delicate area and it is possible that, for example, a collector might decide not to bequeath his/her collection to a particular institution were he/she to believe that parts of it might be rejected. However, this does not lessen the need to follow the procedures set out above. If the donor were to go ahead and make the bequest regardless of the museum's expressed concerns, then the museum could not accept the suspect items.

When an unacceptable item is offered as a gift, the museum might, with the donor's agreement, arrange to accept it temporarily with the intention of returning it to the country of origin. In this case the museum must not accession the item, nor retain it longer than strictly necessary.

10. Archaeological material from the UK

This section includes advice specifically for archaeological items originating in the UK. Sections (a) to (c) apply to terrestrial finds; for objects from wrecks from any part of the UK see section (d).³

a) Material originating in England and Wales

The acquisition by museums of items from England and Wales that are treasure under the Treasure Act 1996⁴ should present no difficulties as these are Crown property and any issues regarding their discovery will have been considered either at the coroner's inquest or by the Treasure Valuation Committee. If museums are acquiring treasure finds that the vendor says have been disclaimed they should make sure that the vendor has documentary evidence to prove this.

There are particular issues that museums need to consider before acquiring gold and silver objects and hoards of coins that were found before the commencement of the Treasure Act on 24 September 1997. Under the old common law of treasure trove which the Treasure Act replaced all gold and silver objects were required to be reported to the coroner but only those objects that had been buried with the intention of recovery could qualify as treasure trove. As a result many precious-metal finds were not reported, particularly if they were single coins or other small items which would have been unlikely to qualify.

Under the Treasure Act 1996, objects found before the commencement of the Act qualify as treasure only if they would have passed the old treasure trove test. If gold or silver objects or coin hoards said to have been found before 24 September 1997 are offered to a museum, it would be advisable to report them to the coroner so that they can determine whether they should be considered as treasure, as this is the only way that the museum can be assured that they will acquire title to the find. The Treasure/Portable Antiquities section at the British Museum is able to advise on such cases.

³ It is also important to avoid acquiring or borrowing items illegally removed from listed buildings.

Museums should be aware that under the Planning (Listed Building and Conservation Areas) Act 1990, it is illegal to demolish, alter or extend a listed building in a way that affects its character as a building of special architectural or historic interest, without suitable listed building consent from the local planning authority. Before acquiring material, which has been removed from a listed building, the museum should satisfy itself that the object was removed as part of authorised alterations. Dealing in objects whose removal was not authorised is an offence under the Dealing in Cultural Objects (Offences) Act 2003.

⁴ That is: objects, other than coins, with at least 10% of gold and silver that are at least 300 years old and coins from the same find that are at least 300 years old, found after 24 September 1997. From 1 January 2003 the Treasure Act was extended to include deposits of prehistoric base-metal objects. The Act applies in England, Wales and Northern Ireland. For full details see: www.finds.org.uk/background/treasure_summary.asp

So far as non-treasure objects are concerned, museums need to be aware that title normally rests with the landowner rather than the finder. When acquiring newly-discovered objects from either the finder or a dealer the curator should attempt to establish the exact location of the findspot and the identity of the landowner and to satisfy him/herself that the landowner has given his/her consent that the object should be offered to the museum (whether by purchase or by gift). It is also good practice to ensure that such objects have been recorded with the Portable Antiquities Scheme. In the case of archaeological objects from England and Wales which do not appear to be recent discoveries, then the curator should ask the vendor to sign a statement verifying their account of the item's provenance.

b) Material originating in Scotland

In order to legally acquire Scottish archaeological material it is necessary to ensure items have been reported through the Treasure Trove/bona vacantia system and disclaimed. All items which are claimed under Treasure Trove/bona vacantia are allocated specifically to museums within Scotland; material which is disclaimed may be acquired by any museum (by donation, purchase, etc) after confirming its status (by seeing the appropriate disclaim certificate). Any Scottish material found after the 1st January 2004 implementation of the Dealing in Cultural Objects (Offences) Act is tainted elsewhere in the UK unless previously disclaimed as Treasure Trove/bona vacantia. The status of Scottish material newly available from old collections will be judged on a case-by-case basis by the Treasure Trove Advisory Panel, to which all such matters should be referred.

c) Material originating in Northern Ireland

In the case of finds from Northern Ireland, museums need to be aware that there has been a legal obligation to report all archaeological finds since 1926. This was most recently restated in the Historic Monuments and Archaeological Objects (Northern Ireland) Order 1995 which includes a statutory requirement under Article 42 for the finder of any archaeological object to report the circumstances of its finding and the nature of the object within 14 days.

The Treasure Act applies in Northern Ireland, which has its own Code of Practice reflecting the different statutory position there. Before 24 September 1997, therefore, the common law of treasure trove also applied to Northern Ireland. In consequence the comments above about finds of potential treasure from England and Wales that are said to have been made before 24 September 1997 will also apply in Northern Ireland, with the additional proviso that museums need to be aware of the requirement that all archaeological objects should be reported. Museums should consult the Environment & Heritage Service for advice.

d) Material from wreck

Any wreck material found in UK territorial waters (to 12 mile limit), or outside the UK and brought within UK territorial waters must by law be reported to the Receiver of Wreck (under *s. 236 of the Merchant Shipping Act 1995*). All wreck material discovered must be reported, however small or seemingly insignificant. Museums should be aware that in the past many items from wrecks were not reported.

The Receiver of Wreck deals with wreck which comes from tidal waters. Material from non-tidal waters are treated as if they were found on land, and come under other legislation (eg *Treasure Act 1996*, *Ancient Monuments and Archaeological Areas Act 1979*).

11. Museums of last resort for items originating in the UK

See Appendix 3 for examples

Museums occasionally act as repositories of last resort for antiquities originating within their local areas of responsibility, and they will on occasion approve the acquisition of antiquities without documented provenance where it can reliably be inferred that they originated within their collecting area within the United Kingdom, and where such payment as may be made is not likely to encourage illicit excavation. This does not apply to items originating outside the UK.

In such cases the following principles should apply:

- The museum should not make a decision to acquire such an item on its own, but should seek external advice and approval from appropriate experts (See Appendix 1)
- The museum should pursue the acquisition in as open a way as possible, including, for example, publishing a note of it in *Museums Journal*, the museum's annual report, or other appropriate publication
- Museums should report items known, or strongly suspected, to have been stolen or illegally removed to the police
- Record details of all actions and discussions concerning the item

It is not possible to foresee any circumstances under which museums should purchase items known to have been stolen or illegally removed. If museums do acquire such items, they would normally come via law enforcement agencies.

It is also crucial to ensure that any such acquisitions are lawful under, for example, the *Dealing in Cultural Objects (Offences) Act 2003* and other legislation.

12. Museum policies, procedures and expertise

Any museum that collects cultural property from overseas, or cultural property that may have been illicitly excavated or illicitly removed in the UK, should agree and publish a policy consistent with these guidelines. See Appendix 2 for the acquisitions policy of the Trustees of the British Museum which may provide a model. The museum's governing body should consider giving their audit committee, or a specially appointed committee, or an external panel, responsibility for checking compliance with acquisition procedures.

The museum must also have access to adequate expertise. Normally the museum should employ staff with the necessary expertise and experience, and ensure that their expertise is kept up to date. The museum should also take specialist advice from external sources, such as other museums, whenever necessary. Guidance on organisations, individuals and publications that can provide specialist advice can be found in Appendix 1.

There must be a clear line of responsibility for approving acquisitions. Ensuring the ethical acceptability of acquisitions is ultimately the responsibility of the governing body.

It is essential that the acquisition, whether by purchase or gift, is registered through a standard, recognised form (an example of the British Museum's form can be found in Appendix 3). Proper records must be kept on a file of due diligence enquiries. As appropriate record the following:

- conclusions drawn from a physical examination of the item
- information about factors specific to the type of item or place of origin
- expert advice requested and any assessment made of advice received
- checks made into the item's provenance
- documentary proof of provenance, or any sworn statements confirming provenance
- checks made to ensure the item falls within relevant legislation of the country of origin, or any intermediate country
- advice received about the item or the vendor

In cases where documentary evidence or an affidavit is not available it is essential to record the reasons why the acquisition was nevertheless made. This will be for one of the reasons specified above. There should be a statement, signed by the staff member responsible, noting the deficiencies in documentation and setting out the case for the exception. In the case of minor items an explanation must be given for the definition of the item as minor and confirming that there is no suspicion about the item's ethical status.

Relationships with dealers should be well documented with formal contracts. If buying at auction take careful account of the auction house's standard conditions of sale. Making enquiries about the provenance of an item offered for sale at auction is more important than concealing the museum's interest in bidding for the item (which can be done anonymously, through an agent).

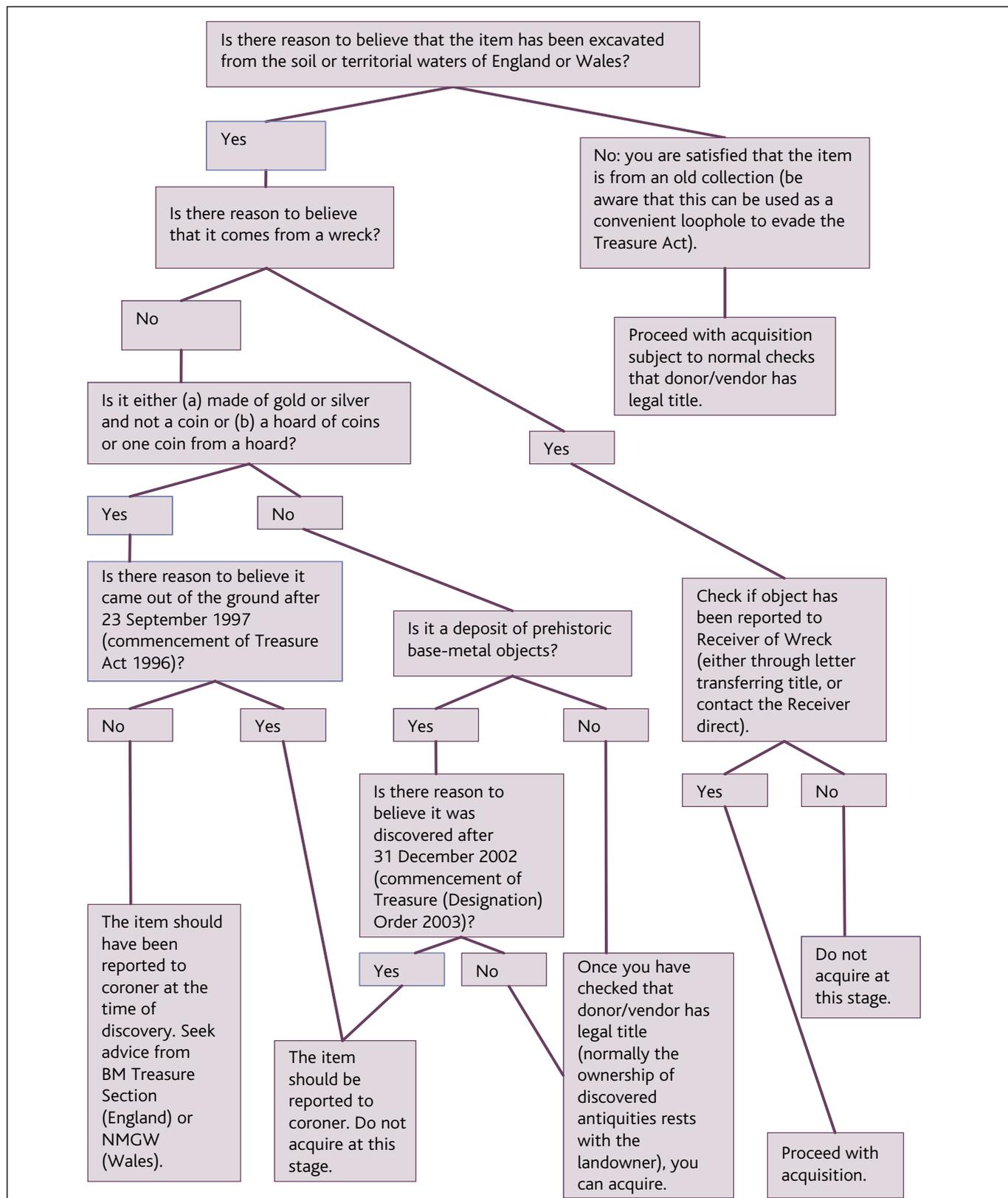
An effective means of securing compliance with necessary legal, ethical and professional standards may be to require that a party supplying an object to a museum (whether by sale, loan or otherwise) give a binding contractual promise that its own acquisition was accompanied by equivalent standards. By embedding the necessary principles into the transacting structure and demanding a commitment to comparable standards from its contractual neighbours, a museum not only safeguards its own legal and ethical integrity but tests the integrity of its suppliers and sources, in a manner underpinned by strong civil law sanctions. Museums could usefully consider devising a standard contractual term to that effect. Such contractual obligations should of course be kept under review in the light of legal developments.

13 Inward Loans

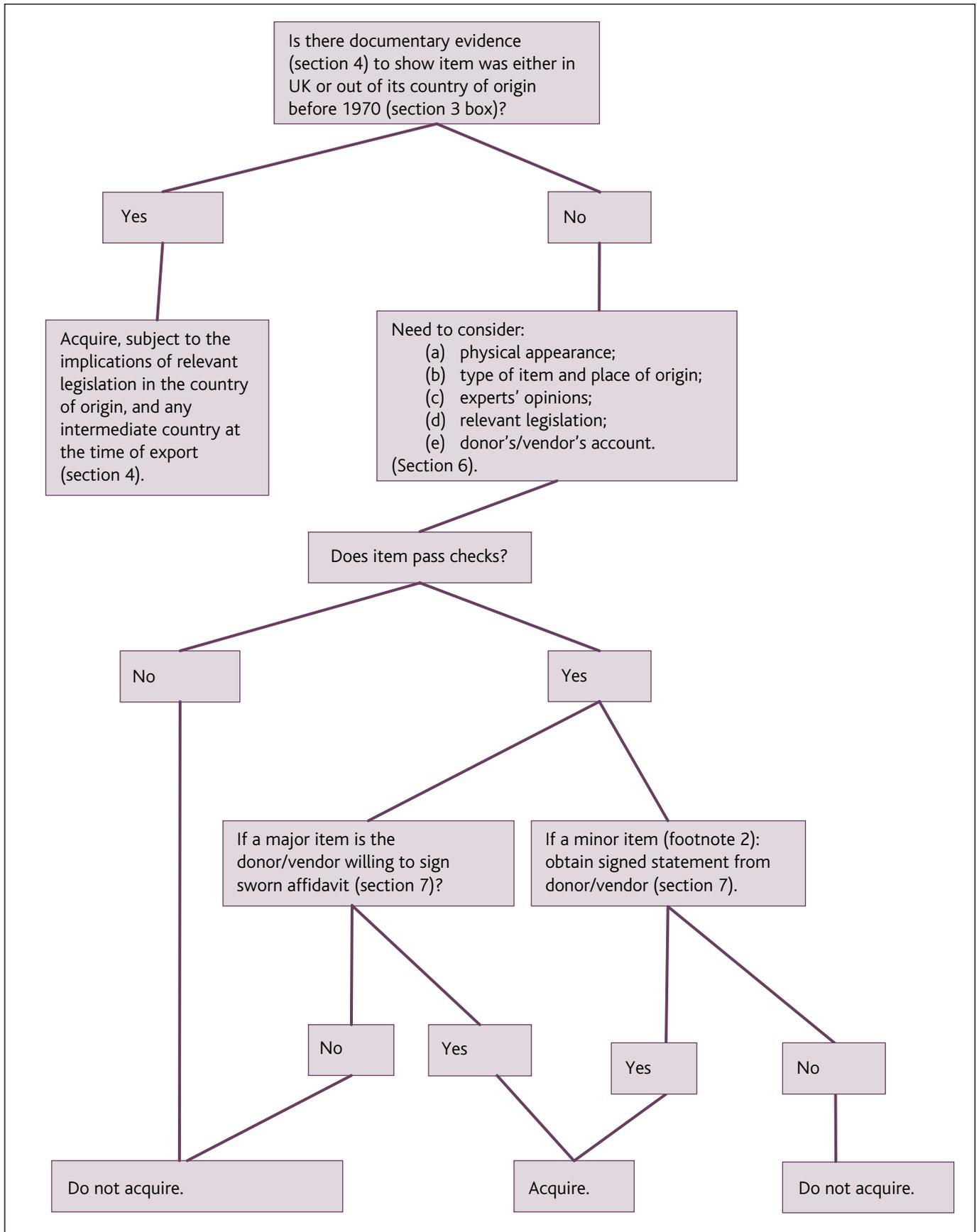
The same standards should be applied to inward loans as to acquisitions, with the exception of taking short-term custody of an item for purposes of undertaking due diligence or assisting law enforcement authorities or others aiming to curb the illicit trade. In these cases the item is more likely to be entered in a day book than accepted under a loan agreement.

Summary flowchart (1): archaeological items from England and Wales

(Note: for items from Scotland consult the Treasure Trove Secretariat; for items from Northern Ireland, the Environment and Heritage Service, Northern Ireland)



Summary Flowchart (2) for objects from outside the UK



Appendix 1

Sources of advice include:

The following websites include numerous links to further sources of information.

Museums, Libraries and Archives Council:

www.mla.gov.uk

Includes link to cultural property acquisition advice site, to be launched in 2006. MLA website includes information on Acceptance in Lieu, the Portable Antiquities Scheme and export licensing.

ICOM:

www.icom.org

Includes ICOM Code of Ethics, ICOM red lists detailing cultural objects at risk around the world and links to other sources of information including relevant publications.

UNESCO:

www.unesco.org

Information and advice regarding 1970 Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Cultural Property and the Cultural Heritage Laws Database.

McDonald Institute for Archaeological Research:

www.mcdonald.cam.ac.uk

Includes links to other sources information and a comprehensive list of publications dealing with the subject of illicit trade.

DCMS:

www.culture.gov.uk

www.culture.gov.uk/cultural_property

Information regarding cultural property and export licensing.

Museums Association:

www.museumsassociation.org

For the Museums Association Code of Ethics and Ethical Guidelines.

Portable Antiquities Scheme/ British Museum Treasure Section, British Museum

<http://www.finds.org.uk>

Treasure Trove Secretariat, c/o National Museums of Scotland

www.treasuretrove.org.uk

Environment and Heritage Agency, Northern Ireland

www.ehsni.gov.uk/built/monuments/treasure.shtml

Receiver of Wreck

www.mcga.gov.uk/c4mca/mcga-dops_environmental/mcga-dops_row_receiver_of_wreck.htm

The Art Loss Register:

www.artloss.com

Links to international stolen art sites

<http://www.saztv.com/page26.html>

Sources of advice on Spoliation:

www.nationalmuseums.org.uk

Specialist advice is available from other museums:**BRITISH MUSEUM**

www.thebritishmuseum.ac.uk

- Department of Ancient Egypt and Sudan
- Department of Ancient Near East
- Department of Coins and Medals
- Department of Conservation, Science and Documentation
- Department of Ethnography
- Department of Greek and Roman Antiquities
- Department of Prehistory and Europe
- Department of Asia

VICTORIA & ALBERT MUSEUM

www.vam.ac.uk

- Asian Department
- Furniture, Textile and Fashion Department
- Sculpture, Metalwork, Ceramics and Glass Department
- Word and Image Department

NATIONAL MUSEUMS AND GALLERIES OF WALES

www.nmgw.ac.uk

- Department of Archaeology and Numismatics

ULSTER MUSEUM

www.ulstermuseum.org.uk

- Department of Archaeology and Ethnography

ASHMOLEAN MUSEUM, OXFORD

www.ashmol.ox.ac.uk

FITZWILLIAM MUSEUM, CAMBRIDGE

www.fitzmuseum.cam.ac.uk

THE MANCHESTER MUSEUM

www.manchester.ac.uk

Egypt

Mediterranean

Near Eastern Archaeology

NATIONAL ARCHIVES

www.nationalarchives.gov.uk

For the archives advisory service and information on policy and legislation

BRITISH LIBRARY

www.bl.uk

NATIONAL MUSEUM OF SCOTLAND

www.nms.ac.uk

- Department of Archaeology
- Department of Scotland and Europe
- Department of World Cultures

Appendix 2

Extracts from policies/ codes/ statements and reports current at time of publication relating to illicit trade and the acquisition of cultural objects:

1970 UNESCO Convention:

Article 7

The States Parties to this Convention Undertake:

a) to take the necessary measures, consistent with national legislation, to prevent museums and similar institutions within their territories from acquiring cultural property originating in another State Party which had been illegally exported after entry into force of this Convention, in the States concerned.

The British Museum Policy on Acquisition

4. Ethics

- 4.1 The Museum will acquire only objects that are legally available for acquisition (not, e.g. to which a vendor does not have legal title).
- 4.2.1 The Museum will not accept whether as a gift or bequest, or on purchase, any object without obtaining the confirmation of the donor or seller that s/he owns the object, and is able to transfer it free from encumbrances. The Museum must also have reasonable cause to believe that the current holder is legitimately entitled to retain the object or that the object was not stolen, illegally exported or illegally imported.
- 4.2.2 The British Museum deplores the looting of antiquities with the ensuing damage to archaeological sites and loss of cultural context. Archaeological objects are a finite resource and each loss or destruction of their context irrevocably diminishes the world's archaeological heritage. The Museum does not and will not acquire objects resulting from such looting.
- 4.2.3 The policy of the Trustees of the British Museum is to refuse to acquire objects that have been illegally excavated and/or illegally exported from their countries of origin since 1970.
- 4.2.4 There may be occasions when acquisition outside of the application of this policy is considered, as for example could occur where objects were otherwise under threat of destruction. Such circumstances would be treated as wholly exceptional and would be matters for discussion by the Trustees.

- 4.2.5 Wherever possible the Trustees will only acquire those objects that have documentation to show that they were exported from their country of origin before 1970 and this policy will apply to all objects of major importance. The Trustees recognize, however, that in practice many minor antiquities that are not accompanied by detailed documentary history or proof of origin and they reserve the right for the Museum's curators to use their best judgement as to whether such antiquities should be recommended for acquisition.
- 4.2.6 The Trustees recognise the principle that regional and national museums must sometimes act as repositories of last resort for antiquities originating within their areas of responsibility, and they will on occasion approve the acquisition of antiquities without documented provenance where it can reliably be inferred that they originated within the United Kingdom, and where such payment as may be made is not likely to encourage illicit excavation.

House of Commons

Culture, Media and Sport Committee

Seventh Report

Cultural Property: Return and Illicit Trade

July 2000

Summary of conclusions and recommendations

(vii) We support the broad principle that museums should avoid acquiring any object that has no secure ownership history, unless there is reliable documentation to show that it was exported from its country of origin before 1970 and we recommend that the Government also state its support for this principle.

Government response to the Seventh Report:

October 2000

The Government endorses the broad principle that museums should avoid acquiring any object that has no secure ownership history, unless there is reliable documentation to show that it was exported from its country of origin before 1970, or the museum is able to obtain permission for the acquisition from the relevant authorities in the country of origin.

ICOM Code of Ethics

3.2 Acquisition of Illicit Material

The illicit trade in objects and specimens encourages the destruction of historic sites, ethnic cultures and biological habitats and promotes theft at local, national and international levels. It places at risk endangered species of flora and fauna, violates the UN *Convention on Biological Diversity* (1992) and contravenes the spirit of national and international patrimony. Museums should recognise the destruction of human and natural environments and loss of knowledge that results from the illicit servicing of the market place. The museum professional must warrant that it is highly unethical for a museum to support the illicit market in any way, directly or indirectly.

A museum should not acquire any object or specimen by purchase, gift, loan, bequest or exchange unless the governing body and responsible officer are satisfied that a valid title to it can be obtained. Every effort must be made to ensure that it has not been illegally acquired in, or exported from, its country of origin or any intermediate country in which it may have been owned legally (including the museum's own country). Due diligence in this regard should establish the full history of the item from discovery or production, before acquisition is considered.

In addition to the safeguards set out above, a museum should not acquire objects by any means where the governing body or responsible officer has reasonable cause to believe that their recovery involved the unauthorised, unscientific or intentional destruction or damage of ancient monuments, archaeological or geological sites, or natural habitats, or involved a failure to disclose the finds to the owner or occupier of the land, or to the proper legal or governmental authorities. Nor should a museum acquire, directly or indirectly, biological or geological material that has been collected, sold or otherwise transferred in contravention of any local, national, regional or international wildlife protection or natural history conservation law, or treaty, of the museum's own country or any other country.

A professional conflict can exist when an acquisition, highly desired by a museum, lacks provenance. However, the ability to establish legal title to the item must be an overriding factor when considering acquisition. In very rare cases an item without provenance may have an inherently outstanding contribution to knowledge that it would be in the public interest to preserve. Such discovery is likely to be of international significance and should be the subject of a decision by specialists in the discipline concerned. The basis of the decision should be without national or institutional prejudice, based on the best interests of the subject discipline and be clearly stated.

Restructuring of ICOM Code of Ethics:

ACQUIRING COLLECTIONS

2.2 Valid Title

No object or specimen should be acquired by purchase, gift, loan, bequest, or exchange unless the acquiring museum is satisfied that a valid title to it can be obtained. Evidence of lawful ownership in a country is not necessarily valid title. [3.2]

2.3 Provenance and Due Diligence

Every effort must be made before acquisition to ensure that any object or specimen offered for purchase, gift, loan, bequest, or exchange has not been illegally obtained in or exported from, its country of origin or any intermediate country in which it might have been owned legally (including the museum's own country). Due diligence in this regard should establish the full history of the item from discovery or production. [3.2]

2.4 Materials Gained by Unauthorised or Unscientific Fieldwork

Museums should not acquire objects where there is reasonable cause to believe that their recovery involved the unauthorised, unscientific, or intentional destruction or damage of monuments, archaeological or geological sites, or species and natural habitats, or involved a failure to disclose the finds to the owner or occupier of the land, or to the proper legal or governmental authorities. [3.2]

2.7 Repositories of Last Resort

Nothing in this Code of Ethics should prevent a museum from acting as an authorised repository for unprovenanced, illicitly collected or recovered specimens and objects from the territory over which it has legal jurisdiction.

Professional Conduct:

8.5 The Illicit Market

It is highly unethical for museums personnel to support the illicit market in any way directly or indirectly.

New glossary definitions:

Due diligence The requirement that every endeavour is made to establish the facts of a case before deciding a course of action, particularly in identifying the source and history of an item offered for acquisition or use before accepting it.

Legal title Legal right to ownership of property in the country concerned. In certain countries this may be a conferred right and insufficient to meet the requirements of a due diligence search.

Provenance The full history and ownership of an item from the time of its discovery or creation to the present day, from which authenticity and ownership is determined.

Valid title Indisputable right to ownership of property, supported by full provenance of the item from discovery or production.

National Art Collections Fund Policy

In the case of acquisitions that might have been looted or illicitly traded, the Art Fund will, as a general rule, avoid being associated with objects that have appeared on the market without a pre-1970 provenance. In such cases, the following requirements also apply:

- The museum must provide documentary evidence that they have established and verified the provenance of the object prior to 1970. In situations where there is no documentary evidence to verify the pre-1970 provenance, then the museum will require the vendor or his agent to provide a sworn statement that the provenance is as stated.
- In the case of auction sales, the Committee will refuse to consider applications if no provenance prior to 1970 is published in the sale catalogue, unless the museum has first received the necessary documentary proof of provenance from the vendor via the auction house, or in the absence of this, a sworn affidavit. (The importance of ensuring a 'clean bill of health' for the object overrides any concern the museum might have about revealing its interest in bidding to the auction house).

Acceptance in Lieu: Due Diligence

Inland Revenue/Museums, Libraries and Archive Council

Ownership History

Questions (checklist)

1. Do you have written confirmation from the executors (or other relevant persons) that they have unencumbered title to the object and are able to transfer that title? (if so please supply the original signed confirmation.)
2. Can you confirm that there are no third party claims against the object?
3. Can you confirm, to the best of your knowledge, that no claims are likely to exist?
4. When was the object acquired?
5. Can you supply proof of the original acquisition of the object (i.e. bill of sale, letter, early photographic or documentary evidence or early publication in a reputable source etc)? if so, please supply a copy of the evidence available.
6. If it was acquired after 1933, are you able to supply proof of the ownership history between 1933 and 1945? If so, please supply a copy of the evidence available.
7. If the object was obtained abroad, was it brought to the UK before 1970?
8. If the object was obtained from abroad after 1970, do you have an export licence from the country of origin? If so, please supply a copy of the licence.

Extracts from the Museums Association's Ethical Guidelines on Acquisition (2004):

- 4.1 Confirm the legal title of the present owner of the item and the right of the owner to transfer title to the museum. Investigate whether there are any third-party claims on the item.
- 4.2 Perform due diligence checks to ensure that there is no suspicion that since 1970 the item might have been exported, acquired, sold, illegally excavated or removed from a monument, site or wreck, or otherwise transferred in contravention of:
 - UK law
 - If applicable, the law of the country of origin of the item and the law of any other country through which the item has passed
 - International law and international conventions on the protection or export of cultural property or natural history conservation (whether the UK government is a signatory to the treaty or not; see 4.9).
In addition, it is normally unacceptable to acquire antiquities of unknown provenance. For limited exceptions see 4.3.
- 4.3 Reject any item that lacks secure ownership history and do not acquire it, unless:
 - there is reliable documentation to show that it was exported from its country of origin before 1970; or
 - in the best judgements of experts in the field concerned the item is of minor importance and has not been illicitly traded; or
 - in the case of items of UK origin, the museum is acting as an externally approved repository of last resort (see Appendix H); or
 - in the case of objects originating outside the UK, the museum is acting as a place of temporary safety (in which case do not accession the item; see Appendix H)
 - also see 4.4 and 4.15
- 4.4 Under some government policies, laws or conventions there may be procedures to give museums consent to acquire an item that would otherwise be unacceptable under the law or convention. In such cases it is vital to obtain such consent before acquiring the item. It will often be necessary to obtain approval of the government of the country of origin as well as that of the UK government.
- 4.11 Decline to offer expertise on, authenticate, or otherwise assist the current possessor of any item that may have been illicitly obtained, unless it is to assist law enforcement or to support other organisations in countering illicit activities. It may be acceptable to record information about suspected illicit items, but do not allow the information to be used inappropriately for personal or institutional benefit. Take advice from impartial experts if necessary.
- 4.12 Report any suspicion of criminal activity to the police. Report any other suspicions of illicit trade to other museums collecting in the same area and to organisations that aim to curtail the illicit trade (see Appendix F).

- 4.13 Avoid appearing to promote or tolerate the sale of any material without adequate ownership history through inappropriate or compromising associations with vendors, dealers or auction houses. Do not borrow items if there is any suspicion that they may be illicit. Refuse to lend items to any exhibition that appears likely to include illicitly traded items.
- 4.14 Prior to acquiring an item be aware of the terms and conditions of any funding bodies assisting financially in the acquisition. Consider consequences for the museum in the event of the item being returned to the rightful owner if it later emerges that the item was illicitly traded (despite the best endeavours of the museum to ensure this was not the case when the acquisition was made).

Extract from the Museums Association's Code of Ethics (2002):

- 5.7 Exercise due diligence when considering an acquisition or inward loan. Verify the ownership of any item being considered for acquisition or inward loan and that the current holder is legitimately able to transfer title or to lend. Apply the same strict criteria to gifts, bequests and loans as to purchases.
- 5.8 Reject any item if there is any suspicion that it was wrongly taken during a time of conflict, unless allowed by treaties or other agreements.
- 5.9 Reject any item if there is any suspicion that it has been stolen, unless in exceptional circumstances, this is to bring it into the public domain, in consultation with the rightful owner.
- 5.10 Reject items that have been illicitly traded. Note that the UNESCO convention was finalized in 1970. Reject, therefore, any item if there is a suspicion that, since 1970, it may have been stolen, illegally excavated or removed from a monument, site or wreck contrary to local law or otherwise acquired in or exported from its country of origin (including the UK), or any intermediate country, in violation of that country's laws or any national and international treaties, unless the museum is able to obtain permission from authorities with the requisite jurisdiction in the country of origin.
- 5.11 Reject any item that lacks secure ownership history, unless there is reliable documentation to show that it was exported from its country of origin before 1970, or the museum is acting as an externally approved repository of last resort, or in the best judgement of experts in the field concerned the item is of minor importance and has not been illicitly traded.
- 5.12 Contact colleagues and appropriate authorities both in the UK and overseas for any information or advice that may be necessary to inform judgement regarding the legitimacy of items considered for acquisition or inward loan.
- 5.13 Comply not only with treaties which have been ratified by the UK Government, but also uphold the principles of other international treaties intended to curtail the illicit trade, if legally free to do so.
- 5.14 Report any suspicion of criminal activity to the police. Report any other suspicions of illicit trade to other museums collecting in the same area and to organizations that aim to curtail the illicit trade.
- 5.15 Avoid appearing to promote or tolerate the sale of any material without adequate ownership history through inappropriate or compromising associations with vendors, dealers or auction houses. Refuse to lend items to any exhibition that is likely to include illicitly traded items.
- 5.16 Decline to offer expertise on, or otherwise assist the current possessor of any item that may have been illicitly obtained, unless it is to assist law enforcement or to support other organizations in countering illicit activities.

Museums Association Code of Practice for Museum Authorities 1977

- 4.3 The Association considers it essential that notwithstanding the fact that the UNESCO convention has not yet been ratified by the United Kingdom each museum should comply with the terms and ethical principles of the convention so far as these are applicable to an individual museum authority.
- 4.5 A museum should not acquire, whether by purchase, gift, bequest or exchange, any work of art or object unless the governing body or responsible officer as appropriate is satisfied that the museum can acquire a valid title to the specimen in question and that in particular it has not been acquired in, or exported from its country of origin (and/or any intermediate country in which it may have been legally owned) in violation of that country's laws

Museums, Libraries and Archives Council Museum Accreditation Standard 2004

8. Acquisition procedures
- a. The museum will exercise due diligence and make every effort not to acquire, whether by purchase, gift, bequest or exchange, any object or specimen unless the governing body or responsible officer is satisfied that the museum can acquire a valid title to the item in question.
 - b. In particular, the museum 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).
 - c. 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 November 1 2002, and the Dealing in Cultural Objects (Offences) Act 2003, the museum will reject any items that have been illicitly traded. The governing body will be guided by the national guidance on the responsible acquisition of cultural property issued by DCMS in 2005.
 - d. So far as biological and geological material is concerned, the museum will not acquire by any direct or indirect means any specimen that has been collected, sold or otherwise transferred in contravention of any national or international wildlife protection or natural history conservation law or treaty of the United Kingdom or any other country, except with the express consent of an appropriate outside authority. Or The museum will not acquire any biological or geological material.
 - e. [Please include either of the following paragraphs as appropriate]The museum will not acquire archaeological antiquities (including excavated ceramics) in any case where the governing body or responsible officer has any suspicion that the circumstances of their recovery involved a failure to follow the appropriate legal procedures, such as reporting finds to the landowner or occupier of the land and to the proper authorities in the case of possible treasure as defined by the Treasure Act 1996 (in England, Northern Ireland and Wales) or reporting finds through the Treasure Trove procedure (in Scotland).

or

The museum will not acquire any archaeological material.

- f. Any exceptions to the above will only be because the museum is either:
- acting as an externally approved repository of last resort for material of local (UK) origin;
 - or acquiring an item of minor importance that lacks secure ownership history but in the best judgement of experts in the field concerned has not been illicitly traded;
 - or acting with the permission of authorities with the requisite jurisdiction in the country of origin;
 - or in possession of reliable documentary evidence that the item was exported from its country of origin before 1970.

In these cases the museum will be open and transparent in the way it makes decisions and will act only with the express consent of an appropriate outside authority.

MDA – Spectrum minimum standards

Acquisition:

Ensure that collecting complies with the museum's collecting policy, and does not contravene any local, national or international law, treaty or recognised practice.

International Council on Archives Code of Ethics:

Archives should be aware that acquiring documents of dubious origin, however interesting, could encourage an illegal commerce. They should cooperate with other archivists and law enforcement agencies engaged in apprehending and prosecuting persons suspected of theft of archival records.

The European Convention on the protection of the Archaeological Heritage – Valletta 1992

Prevention of the illicit circulation of elements of the archaeological heritage

Article 10

Each party undertakes:

- i. to arrange for the relevant public authorities and for scientific institutions to pool information on any illicit excavations identified;
- ii. to inform the competent authorities in the State of origin which is a Party to this Convention of any offer suspected of coming either from illicit excavations or unlawfully from official excavations, and to provide the necessary details thereof;
- iii. to take such steps as are necessary to ensure that museums and similar institutions whose acquisition policy is under State control do not acquire elements of the archaeological heritage suspected of coming from uncontrolled finds or illicit excavations or unlawfully from official excavations.

Appendix 3

Case studies illustrating the use of Due Diligence procedures

- **Due diligence resulting in a museum being able to acquire**

1. A department in a museum had, on several occasions, received excavation material (all legitimately acquirable and fully documented) from a UK citizen. On his death he left a large bequest of material from a south African country. There was no attached documentation whatsoever and the relevant curator was fairly certain that the export of part, if not all of the collection to the UK, had contravened the source country's antiquity laws. The curator contacted the main state museum in the country's capital, giving a full description of the material and all information (as much as was available) on how it had come to the UK. The source country was offered, formally, the possibility of taking the material back.

There then followed a very long silence. After further prompting from the curator the source country made its decision. Lack of space to display or store the material and the lack of funds to do so, even if space were available, meant that the source country actively urged the museum to keep the material. It was made clear that material was likely to be 'disposed of' if it was returned. The source country offered to transfer title to the museum informally, but after repeated requests from the museum in Britain, issued documents transferring full title.

- **Due diligence resulting in institutions declining acquisition**

2. A London dealer offered a museum a very fine Etruscan/early Roman vase with a stamped name inscription. None of the available documentation took the object back as far as 1970. The curator researched this and similar pieces and became convinced that it had originated in a Swiss collection, formed largely during the 1970s. The curator put this to the dealer, who then found some documentation to corroborate that this was indeed the case. The acquisition did not proceed further.
3. A museum was offered an Etruscan silver figurine of a warrior putting on a breast-plate. The piece was outstanding, but the relevant curator thought immediately of several pieces of the same quality and a similar subject which had been reported missing from a site in northern Italy. The acquisition did not proceed further.

Case studies of Museums acting as places of last resort for UK antiquities

4. Donhead St Mary hoard of Iron Age coins: This hoard of 88 Iron Age gold coins was reported by a metal detector user as potential treasure who said he found it at a site which subsequently proved to be a scheduled ancient monument. It was declared to be treasure trove at an inquest in 1987. The finder was convicted under 1979 Ancient Monuments and Archaeological Areas Act for metal detecting on a scheduled site and fined £100. The hoard was subsequently valued at £5,210 and the Treasury decided to reduce the reward to £2,000 in view of the fact that the finder had been convicted for searching on a scheduled monument. The British Museum did not wish to acquire the hoard and was happy that Salisbury Museum should. However, Salisbury Museum decided they could not pay the £2,000 required by the Treasury since to do so would break the Museum Association's Code of Practice to which the museum subscribed. It then became clear that if no museum wished to acquire the hoard the whole find would be returned to the finder, so that he would gain greater benefit from his crime than if a museum had acquired the coins. In the end the British Museum acquired the hoard in order to prevent this happening. The case caused an outcry among archaeologists and under the arrangements set out in the Treasure Act Code of Practice the independent Treasure Valuation Committee now has a role in advising in cases where a reward should be abated or not paid at all.

Appendix 4

Examples of useful documents:

Example of wording for a sworn affidavit:

I [NAME] of [ADDRESS] **DO SOLEMNLY AND SINCERELY DECLARE** as follows:

1. Between 19?? and 19?? I acquired the item [DETAILS OF ITEM] which is to be acquired by [NAME OF MUSEUM]
2. I HEREBY DECLARE that the material on the list dated [DATE] was lawfully acquired by me before 1970 AND I MAKE THE SOLEMN DECLARATION conscientiously believing the same to be true and by virtue of the Statutory Declarations Act 1835

DECLARED by the said [NAME]

at [address where declaration made]

this [DATE]

[signature]

Before me

[signature]

Solicitor/Commissioner for Oaths

DONOR/VENDOR FORM (BRITISH MUSEUM)

Received of (use Block Capitals)

Address

Telephone

Sale/donation (delete)

Price (estimated if donation): £

Brief description of proposed purchase/gift:

Donor / vendor statements (affix signed letter or photocopy of this page to top-sheet if not present):

Our acquisition policy (2004) statement 4.2.5:
‘Wherever possible the Trustees will only acquire those objects that have documentation to show that they were exported from their country of origin before 1970 and this policy will apply to all objects of major importance. The Trustees recognise, however, that in practice many minor antiquities are not accompanied by detailed documentary history or proof of origin and they reserve the right for the Museum’s curators to use their best judgement as to whether such antiquities should be recommended for acquisition.’

There is documentation to show this:

yes —/no—/antiquity has export licence—/antiquity is British—

I warrant that I have the right to transfer the above mentioned to the British Museum as absolute beneficial owner free from third party claims and other encumbrances and that any information provided herein as to the provenance of the said object is true to the best of my knowledge information and belief and I hereby offer to sell / donate the same to the British Museum upon such terms as are set out in this statement:

Signature of donor/vendor **date.....**

Any other relevant information about the collection history of the proposed acquisition or conditions attached to donation:

FOR OFFICIAL USE ONLY

Received by

date.....

Curator's statement:

This acquisition fulfils the requirements of the British Museum's acquisition policy (2004)

signature

date.....

Acquired/Returned (delete) Registration number (when known):.....

Acquisition approved by:

date.....



**Department for Culture,
Media and Sport**

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