

The UCL Cultural Property Policy

UCL adopted the Cultural Property Policy in June 2009. It applies to all staff and students at UCL, and to all UCL sites and activities whether in the UK or elsewhere.

Cultural Property is defined as ‘individual objects, collections, specimens, structures or sites identified as having artistic, historic, scientific, religious or social significance, whether or not they are held and maintained principally for their contribution to knowledge and culture.’

The Policy acknowledges that UCL has a long history of collecting cultural property to support teaching and research and emphasizes that we should continue to do this legally, ethically and responsibly. Everyone at UCL who works with cultural property must do so in an honest, open and transparent manner. The Policy provides guidance and procedures on how this should be done, and these are outlined below.

Every department will nominate an **accountable person** to:

1. Account for cultural property

All cultural property of material financial value must be accounted for in accordance with the ‘Statement of Recommended Practice (SORP): Accounting for Further Education’ and the ‘Financial Reporting Standards’ with respect to heritage assets.

To this end, all significant cultural property will be listed in the **Cultural Property Register**, which will be maintained by UCL Finance. Listings in the Register will include: the *name of the department* where the cultural property is stored, a *brief description* of the cultural property, the *method of acquisition*, the *price/value* of the object and the *date of acquisition*. The accountable person should provide as much of this information as possible when compiling entries for the Register and this should be sent to UCL Finance.

2. Ensure all people working with cultural property exercise **due diligence** when acquiring and managing cultural property.

Cultural property may be acquired deliberately - by purchase, exchange, gift or bequest, loan, laboratory/clinical procedure, fieldwork - or inadvertently, e.g. material abandoned on UCL property.

The accountable person must ensure that all members of their department exercise due diligence when acquiring cultural property by:

- Working with **reputable sources**
- Only acquiring objects where the owner can demonstrate **valid title**. All donors and lenders must provide **written evidence** of their ownership of the cultural property. For items exported after 1970 this will include valid export permits, licenses and customs documentation demonstrating legal export. For items exported before 1970, and in cases where these documents are not available, an affidavit stating belief of legal export will suffice.
- Not accepting objects which have been acquired in contravention of inter/national law or by damaging archaeological sites or Sites of Special Scientific Interest

- **Examining and evaluating the object** and the situation for suspicious circumstances, e.g.:
 - a lower than market value price or evidence that the object has been recently excavated or has been in a museum collection
 - checking against published databases for lost or stolen items, e.g. the art loss register
 - giving particular attention to objects from parts of the world particularly vulnerable to looting, e.g. Iraq, Afghanistan, Southeast Asia
- Noting that UCL has the **right to refuse gifts, bequests or loans**
- Noting that all **loans** should have a **set purpose and a fixed (renewable) lending period**.
- Noting that cultural property in the possession of but not owned by the member of staff or student will be considered as being on loan to UCL and accounted for as such
- Not accepting **gifts** if they come with preconditions (unless these relate to conservation)
- Noting that any acquisition with serious financial implications, e.g. investment required for security, insurance, or care, requires authorization from the UCL Council (following recommendation by the Museums, Heritage and Cultural Property Committee)
- Repatriating **inadvertently acquired** cultural property to its country of origin, where possible
- When in doubt, **seeking advice** from UCL Museums & Collections or UCL Library Services.

Cultural Property must be disposed of in a manner which generates the most benefit for UCL’s mission. This may be by transfer (e.g. to another public institution), sale or destruction.

No item on the Cultural Property Register may be disposed of:

- Under instruction from a single person
- Without consent of the Director of UCL Museums & Collections or UCL Library Services
- In contravention of original terms of acceptance. It is important to note that disposals may be governed by conditions/limitations imposed by the donor.

Please note that the UCL Council may choose to repatriate cultural property and candidate objects for disposal should be offered to UCL Museums & Collections or Library Services in the first instance.

The policy also outlines particular **individual working responsibilities** including:

- Students/members of staff working collaboratively with other organizations or in their own time should be mindful of any risks to UCL’s reputation and any potential conflict of interest between UCL and other organizations. If working in their own time, e.g. working on an archaeological excavation, they should ensure that all work is carried out legally and reported properly
- ‘Personal items’ of cultural property of trivial academic or financial value may be stored on UCL premises without permission. In such cases the individual member of staff or student is responsible and liable for any loss or damage to UCL property as a result of the material being kept at UCL
- Failure to adhere to the Policy may result in disciplinary action.

Further details, including the Policy documents, guidance, forms, flow charts and background to the Cultural Property Policy can be found on our website:

www.ucl.ac.uk/cultural-property