



HISTORIC ROYAL PALACES

# Historic Royal Palaces Human Remains Policy

(Part of the Collections Management Policy Framework)

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## Key Facts and Purpose

- This policy applies to all Historic Royal Palaces (HRP) employees, volunteers and contractors working with HRP's collections and the information held about them.
  - This policy covers how HRP engages with human remains. It outlines the legal and ethical framework of engaging with the dead in line with professional standards for archaeological works and collections management.
  - This policy is approved through HRP's Board of Trustees and overseen by HRP's Collections Group.
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### 1. Introduction

This Policy covers Historic Royal Palaces (HRP) engagement with human remains. Overall, HRP is committed to:

- (i) Treating all human remains with dignity and respect;
- (ii) Fulfilling its responsibilities as set out by the legislative framework<sup>1</sup>; and
- (iii) Following all appropriate professional codes of conduct concerning human remains.<sup>2</sup>

HRP recognises that human remains are uniquely emotive, and that particular sensitivity is required in all aspects of their management. However, HRP also acknowledges that human remains, in all their forms and contexts, are important, finite, and irreplaceable sources of scientific and cultural information which are integral to the study of our past.

HRP will ensure that decisions concerning human remains are made accountably, for the public interest, take ethical considerations into account, and that particular emphasis is placed on the feelings of living family members (where known), alongside faith, community, and cultural groups.

This policy should be read in conjunction with those concerning acquisitions, deaccessioning, and collections care.

This policy will be kept under active review by HRP in response to modern and developing societal views regarding the use and display of human remains in museums and in relation to archaeological excavation or analysis.

### 2. Human Remains

This policy follows the definition of human remains as set out by DCMS and expressed by the British Museum.<sup>3</sup> Human remains are parts of once living people from the species *homo sapiens sapiens* (defined as individuals who fall within the range of anatomical forms known today and in the recent past) including:

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<sup>1</sup> *Burial Act, 1857; Ancient Monuments and Archaeological Areas Act, 1979; Disused Burial Grounds (Amendment) Act, 1981; Human Tissue Act, 2004; Ecclesiastical Jurisdiction and Care of Churches Measure, 2018* and any other relevant legislation.

<sup>2</sup> Team for Culture, Media and Sport, '*Guidance for the Care of Human Remains in Museums*', (2005); World Archaeology Congress, '*Code of Ethics*', 2016; P Mitchell, M Brickley, '*Updated Standards for Recording Human Remains*', (Chartered Institute for Archaeologists, 2017); The Advisory Panel on the Archaeology of Burials in England, '*Guidance for Best Practice for the Treatment of Human Remains Excavated from Christian Burial Grounds in England*', (2017); Chartered Institute for Archaeologists, '*Standard Guidance for an Archaeological Watching Brief*', (2014, revised 2020); Society for Museum Archaeology, '*Standards and Guidance in the Care of Archaeological Collections*', (2020); The Advisory Panel on the Archaeology of Burials in England, '*Science and the Dead: Destructive sampling of Archaeological human remains for Scientific Analysis*' (Second Edition, 2023) and other relevant standards as set out by the Chartered Institute for Archaeologists (CIfA), Historic England and the Advisory Panel of the Archaeology of Burials in England (APBE), The Church of England (CoE) and other relevant institutions.

<sup>3</sup> The British Museum, British Museum Policy, Human Remains in the collection, 2006.



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- (i) Osteological/Archaeological material (whole or part skeletons, individual bones or fragments of bone);
- (ii) Soft tissue including organs and skin; and slide preparations of human tissue;
- (iii) Any of the above, that may have been modified in some way by human skill and/or may be bound-up with nonhuman materials, to form an artefact composed of several materials; and
- (iv) Artworks/other items composed of human bodily fluids or soft tissue;

As set out in DCMS Guidance for the Care of Human Remains in Museums (2005), human hair and nails, though consisting of human tissue, are not normally considered to be subject to the principles set out in this policy, unless: forming part of other human body parts described in (i) and (ii) above; or, exceptionally, there is evidence to suggest they were removed without the consent of the deceased. HRP recognises that, though not explicitly included within these principals, these may be of sacred importance to particular communities. Therefore, each require sensitivity of approach and will be treated with due consideration, respect, and dignity.

### **3. Excavation of Human Remains**

Human remains are principally engaged with by HRP in the form of articulated and disarticulated Christian human remains encountered during archaeological excavations, though there is also limited potential to encounter pre-Christian and non-Christian remains within HRP's sites. HRP acknowledges that burials should, as a matter of principal, not be disturbed without suitable ethical justifications and permissions specific to that work, but that on occasion such work is unavoidable.

Prior to works involving excavation, the Curatorial Team will determine the potential of encountering human remains. This will include an assessment of the potential to encounter pre-Christian remains or those associated with varying faiths, practices, and beliefs, and whether living relatives or cultural groups may be identified. Where such potential is deemed to exist, appropriate measures will be taken to:

- (i) Eliminate any impact or excavation within the/se area/s or;
- (ii) Where (i) cannot be achieved, to set out an appropriate ethical framework, acquire appropriate legal permissions and conduct a fully funded archaeological excavation as briefed by the Curatorial Team in line with all appropriate best practice, and in liaison with faith leaders as appropriate;
- (iii) In the exceptional event where a royal interment may be disturbed, suitable advice will be sought from the Royal Household.

Following the excavation, all archaeological human remains (i.e. remains in excess of 100 years old) and any grave goods or associated artefacts will be appropriately stored by HRP



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or an appropriate Archaeological Contractor, as set out in section (8), in line with all appropriate professional guidance.

The human remains and any associated artefacts will subsequently be assessed by a qualified osteoarchaeologist/artefact specialist within the context of usual recording, where not prohibited within the identified faith of those remains. Following this, the human remains and/or artefact(s) will be returned to HRP in a timely manner and appropriately stored, as set out in section (8), by Curatorial and Collection & Conservation Care Teams prior to assessment for reinterment, retention, or further analysis.

All excavations impacting human remains will include appropriate funding for further scientific analysis and publication. All excavations which result in the exhumation of human remains will be published, regardless of whether further testing is undertaken.

HRP does not care for sites in which non-archaeological human remains (i.e. remains less than 100 years old) should be encountered, if this occurs then HRP will immediately cease works and contact the appropriate regional police authority.

### **4. Reinterment & Retention of Human Remains**

HRP recognises that consent from the individual for excavation cannot be obtained from excavated human remains and consequently, suitable reinterment in keeping with the law and best practice must remain the default position. However, HRP also recognises that the significance (i.e. scientific/historic/research/teaching potential) of those remains may justify their retention as part of HRP's Archaeological Collection.

In the context of the sites which HRP cares for, in which only Christian burial grounds are located, the most suitable place of reinterment will be the closest consecrated Christian place of worship, within an ossuary to avoid additional impact upon other burials. However, previous excavations have shown some potential to encounter pre-Christian remains within the palaces, should this occur, the human remains will be assessed according to these principals on a case by case basis. If burials of other faiths are identified, specific advice will be sought from appropriate faith leaders.

The significance of any human remains, and their potential for future study, will be determined by the Curatorial Team on a case by case basis following the initial assessments as set out in section (3), in keeping with the determined faith and cultural practices of the remains.

- (i) In the first instance, those human remains determined to hold limited significance as set out above will be reinterred in accordance with the law, best practice, and in keeping with the determined faith, practice, and belief of that individual.
- (ii) If the remains are deemed to hold moderate to high significance as set out above, and if possible or practicable, reinterment of the remains may be reasonably delayed and additional assessment undertaken prior to reinterment.



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During this period the remains will *not* be accessioned, but will be stored, as set out in section (8), in keeping with all relevant legislation and in line with all appropriate professional guidance in a manner whereby the context of their recovery, location of original interment, and justification for retention is made clear. A designated lead from both the Curatorial and Conservation & Collection Care Teams will be assigned as caretakers to ensure their safety and prevent dissociation of the remains. Once the potential of those remains is exhausted, the individual will be suitably reinterred as stated in (i).

- (iii) In the event that the significance of the remains is determined to be very high or exceptional as set out above, human remains may be accessioned into HRP's Archaeological Collection, provided that appropriate permissions are granted.

These remains will be stored appropriately, as set out in section (8), in line with all appropriate legislation and professional guidance in a manner whereby the context of their recovery and justification for retention is made clear.

- (iv) In the exceptional event that a royal interment is exhumed, suitable advice will be sought from the Royal Household.

### **5. Reinterment & Retention of Grave Goods**

HRP recognises that ethical questions surround the separation of human remains from any associated grave goods, and the intention of that individual, or those who buried them, is that those artefacts remain with the deceased. This is particularly true of intimate items (jewellery, badges of office, clothing etc) and, in general, every effort must be made not to separate grave goods from the remains with which they are associated. However, HRP also recognises that the significance (i.e. scientific/historic/research/teaching potential) of those artefact(s) may justify their retention as part of HRP's Archaeological Collection.

The significance of any artefact(s), and their potential for future study, will be determined by the Curatorial Team on a case by case basis following the initial assessments as set out in section (3), in keeping with the determined faith and cultural practices of the remains with which they are associated.

- (i) In the first instance, those artefact(s) determined to hold limited significance as set out above will be reinterred alongside the individual with whom they were originally interred in accordance with the law, best practice, and in keeping with the determined faith, practice, and belief of that individual.
- (ii) If the artefact(s) are deemed to hold moderate to high significance as set out above, and if possible or practicable, the reinterment of the remains with which they are associated may be reasonably delayed and any additional assessment of those artefact(s) undertaken prior to reinterment in line with (i).



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During this period the artefact(s) will *not* be accessioned, but will be stored, as set out in section (8), in keeping with all relevant legislation and in line with all appropriate professional guidance in a manner whereby the context of their recovery, location of original interment, and justification for retention is made clear. A designated lead from both the Curatorial and Conservation & Collections Care Teams will be assigned as caretakers to ensure their safety and prevent dissociation of the remains and artefact(s). Once the potential of those artefact(s) is exhausted, the artefact(s) will be suitably reinterred alongside the human remains as stated in (i).

- (iii) In the event that the significance of the artefact(s) is determined to be very high or exceptional as set out above, those artefact(s) may be accessioned into HRP's Archaeological Collection, and the associated remains reinterred (as set out in section 4), provided that appropriate permissions are granted.

These artefact(s) will be stored appropriately, as set out in section (8), in line with all appropriate legislation and professional guidance in a manner whereby the context of their recovery, justification for retention, and the location of the individual with whom they were interred (including following reinterment) is made clear.

- (iv) In the event that the human remains, and artefact(s) with which they are associated, are both determined to be of very high or exceptional significance, they may collectively be accessioned into HRP's Archaeological Collection.

These artefact(s) will be stored alongside the human remains with which they are associated, as set out in section (8), in line with all appropriate professional guidance. Where this would have an adverse impact upon that storage (particularly in the case of ferrous metals), these may be stored separately in line with the same guidance in a manner whereby the context of their recovery, justification for retention and location of the individual with whom they were interred is made clear.

- (v) In the exceptional event that artefact(s) associated with a Royal interment are exhumed, suitable advice will be sought from the Royal Household.

## 6. Coffin Furniture & Funerary Monuments

As with grave goods, HRP recognises that particular ethical challenges surround coffin furniture, coffins, and funerary monuments, and that the intention of that individual, or those who buried them, is that those artefact(s) remain with the deceased/the deceased remain within those artefact(s). This is particularly true of identifying or decorative features (such as coffin plates or monuments).



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In general, every effort must be made not to separate these objects from the remains with which they are associated. However, HRP also recognises that the significance (i.e. scientific/historic/research/teaching potential) of those artefact(s) may justify their retention as part of HRP's Archaeological Collection. HRP also recognises that it may not be possible to reinter coffins, monuments or ledger stones due to issues of space, continued use, safety of the artefact(s), or further excavation which may impact other human remains.

HRP recognises that, should a sealed coffin be exhumed during archaeological work, it should, as a matter of principal, not be opened and every effort will be made to re-inter that coffin without further intervention. However, HRP also recognises that the significance (i.e. scientific/historic/research/teaching potential) of the coffin, or remains contained therein, may justify additional study or their retention as part of HRP's Archaeological Collection. As stated above, HRP also recognises that the re-interment of coffins may not be possible due to issues of space, continued use, safety of the coffin or remains contained therein, or further excavation which may impact other human remains.

The significance of any artefact(s) (or coffins, sealed or otherwise), and their potential for future study, will be determined by the Curatorial Team on a case by case basis following the initial assessments as set out in section (3), in keeping with the determined faith and cultural practices of the remains with which they are associated.

- (i) In the first instance, those artefact(s) determined to hold limited significance as set out above will be reinterred alongside the individual with whom they were originally interred or that individual set within the artefact(s) (as appropriate) in accordance with the law, best practice, and in keeping with the determined faith, practice, and belief of that individual, provided this will not cause a detrimental impact as set out above.
- (ii) If the artefact(s) are deemed to hold moderate to high significance as set out above, and if possible or practicable, the reinterment of the remains with which they are associated may be reasonably delayed (or coffin opened) and any additional assessment of those artefact(s) undertaken prior to reinterment in line with (i).

During this period the artefacts will *not* be accessioned, but will be stored, as set out in section (8), in keeping with all relevant legislation and in line with all appropriate professional guidance in a manner whereby the context of their recovery, location of original interment, and justification for retention is made clear. A designated lead from both the Curatorial and Conservation & Collections Care Teams will be assigned as caretakers to ensure their safety and prevent dissociation of the remains and artefact(s). Once the potential of those artefact(s) is exhausted, the artefact(s) will be suitably reinterred as stated in (i).

- (iii) In the event that the significance of the artefact(s) is determined to be very high or exceptional as set out above, or issues of space and further impact become apparent, those artefact(s) may be accessioned into HRP's Archaeological



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Collection, and the associated remains reinterred (as set out in section 4), provided that appropriate permissions are granted.

These artefact(s) will be stored, as set out in section (8), appropriately in line with all appropriate legislation and professional guidance in a manner whereby the context of their recovery, justification for retention, and the location of the individual with whom they were interred (including following reinterment) is made clear.

- (vi) In the event that the human remains, and artefact(s) with which they are associated, are both determined to be of very high or exceptional significance, they may collectively be accessioned into HRP's Archaeological Collection.

Those artefact(s) will be stored alongside the human remains with which they are associated, as set out in section (8), in line with all appropriate professional guidance. Where this would have an adverse impact upon that storage (particularly in the case of ferrous metals), these may be stored separately in line with the same guidance in a manner whereby the context of their recovery, justification for retention and location of the individual with whom they were interred is made clear.

- (vii) In the exceptional event that artefact(s) or coffins associated with a Royal interment are exhumed, suitable advice will be sought from the Royal Household.

### **7. Destructive Sampling and Scientific Assessment**

HRP recognises the importance of the scientific study of human remains to the ongoing study of our society. However, HRP also recognises that such work can be destructive and irreversible. The Curatorial Team will, following the assessment(s) set out above, determine the scientific potential of the assemblage (and subsequent applicability of any destructive sampling), appropriate research outputs, and an ethical framework for these works on a case by case basis.

Specific cultural beliefs concerning human remains may vary significantly between faiths and denominations. As a result, the Curatorial Team must ensure the faith of that individual/s is understood as far as reasonably practical prior to sampling.

In the case of grave goods, coffin furniture, coffins, monuments, or leger stones, the impact of destructive testing (in so far that it may compromise or escalate the decay of the artefact(s)) will be undertaken by the Curatorial Team in collaboration with the Conservation & Collections Care Team and, if applicable, a methodology created to ensure that objects protection or; appropriate permissions sought and an ethical and research framework created to justify any impact and/or loss in accordance with best practice.





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In general, where human remains are deemed likely to be encountered during an excavation, appropriate funding will be allocated at the outset of the works for full scientific testing (including but not limited to isotopic analysis and radiocarbon dating).

All scientific sampling of human remains will be appropriately published, and datasets appropriately archived to be made available to the scientific community for further study and comparative analysis. Appropriate funding for this will be allocated at the outset of any works which will impact human remains.

HRP will ensure that any human remains are appropriately stored, as set out in section (8), in line with all appropriate professional guidance during any analysis, and that such work will be proportional to the scientific potential of the human remains to maximise the results of those works while minimising their destructive impact. Reinterment or retention following this work will subsequently be undertaken as set out in this document.

### **8. Storage**

HRP commits to storing all human remains according to the law, best practice and those principals set out by the DCMS Guidance for the Care of Human Remains in Museums (2005) and this policy should be read alongside other specific policies regarding the storage and long term care of the collection.

HRP commits to ensuring that human remains have a dedicated, high security, restricted storage area where the remains, and any associated artefacts, are secure, with an appropriate access policy, under appropriate conditions and with an appropriate conservation regime. Responsibility for this lies with the Conservation & Collections Care Team.

Wherever possible, an identifiable individual's remain will be stored in their own container from the moment of excavation, during any analysis, and for interment or retention. The individual storage of these remains will be undertaken according to the law and best practice.

HRP will ensure that robust and comprehensive recording is undertaken as set out in other appropriate policies to prevent disassociation between human remains and any artefacts they were recovered with.

The storage of items formed of, or containing, human tissue (relics, wigs, *memento mori* type jewellery and other such artefacts) which are not classified as human remains according to the 2005 guidance (as set out in section 1) will be stored as appropriate to their materials, conservation requirement, and object type, according to all relevant legislation, guidance and best practice. Although not classified as human remains, HRP recognises the sacred or cultural importance these items may hold and commits to undertaking their storage in a respectful and dignified manner.

### **9. Other Human Remains in the Collection**

HRP holds a limited quantity of historically excavated osteoarchaeological material within the Archaeological Collection. This material will be stored, as set out in section (8), in line with all relevant legislation and best practice ensuring the dignity and respect of the remains, as set



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out in this document. Reinterment, scientific analysis and other such activities which may impact this collection may be considered in the future, and undertaken according to the principals set out in this document, following an appropriate assessment of their significance by the Curatorial Team.

Additionally, HRP holds a number of objects which contain human remains, or human tissue, principally in the form of *memento mori* type jewellery or other remembrances, relics and wigs, clothing or other objects. These will similarly be stored with respect and dignity, as set out in section (8), in line with all relevant legislation and best practice and with regard to specific guidance as appropriate to the item type, its context and conservation requirement.

HRP may acquire new items which contain or are formed of human remains. This will be undertaken in accordance with the relevant acquisition policies and cared for under the principals set out in this document and other relevant policies.

### **10. Public Display and Publicity**

According to the DCMS (2005), visitor surveys show that the majority of museum visitors are comfortable with and often expect to see human remains as part of museum displays. Nevertheless, careful thought and consideration will be taken by HRP to determine the circumstances under which human remains may be used for public display.

Human remains held by HRP will be considered for display in reference to their scientific, educational, and historical importance. HRP will also consider conclusions regarding the individual's religious, spiritual, and cultural beliefs. Although human remains held and engaged with by HRP principally consist of material excavated from Christian burial grounds, remains attributed to other faiths may be encountered and considered for display. Decisions regarding the display of these human remains will be made on a case-by-case basis following sensitive discussion and consultation with modern cultural communities that hold a relevant link with the human remains alongside due diligence undertaken by HRP.

Where appropriate, HRP will carry out due diligence to consult and obtain consent from the descendants of individuals proposed for display. Where the family is contactable, HRP will only go forward with display if family consent is received.

Human remains will only be displayed if HRP is certain that they make unique and material contribution to specific interpretation that could not be made in any other way. HRP will only display human remains when accompanied by sufficient explanatory material. This material should make the use of human remains for a clear educational purpose.

This may include displaying remains in a separate or specially partitioned exhibition space.

HRP will ensure that display conditions of human remains will be monitored and kept in line with appropriate conservation guidance and best practice.

HRP cares for the palaces, its collections, and archaeology, for the 'benefit of the nation' and to 'help everyone learn about the Palaces'.<sup>4</sup> An integral element of this is sharing discoveries,

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<sup>4</sup> Historic Royal Palaces, Royal Charter, 2015



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exhibitions, histories, and any other associated information through publications, marketing, press, media, social media, and any other relevant communication. However, HRP recognises that particular sensitivities must be taken into account when sharing such communications concerning human remains.

Any and all such communications made in connection with human remains, associated artefacts, objects containing human tissue, or any other such artefacts, will be in compliance with the spirit of this policy, ensuring the dignity and respect of those remains or artefact(s). All communication will be respectful of the sensitivities of those individuals, their descendants, and their determined beliefs, practices or faiths. Special consideration will also be given to the sensitivities of individuals, communities, faith groups or others who may be impacted through viewing human remains through such communications. All appropriate guidance will be followed during the creation and sharing of any such communications, and any communication will be reviewed and approved by a HRP curator before being issued publicly.

HRP will not share communications which are either grotesque, or which sensationalise human remains, artefacts containing or associated with human tissue or remains, or any of the works set out in this document.

### **11. Responsibilities & Staffing**

Oversight of the excavation, acquisition/interment and testing of human remains lies with the Curatorial Team. The long term storage and care of human remains within the collection is overseen by the Conservation & Collection Care Team in collaboration with the Curatorial Team in line with other relevant policies. Both of these Teams sit under the Director of Palaces and Collections, who holds ultimate responsibility over HRP's engagement with human remains (except in the care for returns, discussed below).

HRP commits to ensuring that suitable specialty is maintained within these Teams to suitably advise on HRP's continued engagement with human remains and care for those objects within the collection. Where suitably qualified staff are not available HRP will ensure specialist contractors are brought in to advise on any decisions which may impact on human remains.

### **12. Returns**

Claims for the return of remains will be undertaken in line with appropriate legal and professional frameworks on a case-by-case basis, as set out in the 2004 Act and 2005 guidance, and all other appropriate guidance, as set out in section 1. This process will include appropriate research and due diligence undertaken by HRP's Curatorial Team, including 'consideration of possession; the cultural and religious values of the interested individuals or communities and the strength of their relationship to the remains in question; cultural, spiritual and religious significance of the remains; the scientific, educational and historical importance of the material; and the quality of treatment of the remains, both now and in the past in their current location and their care if returned'.



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Upon provision of such evidence by the Curatorial Team, to the Director of Palaces and Collections, final consideration and authorisation for all returns of human remains will be undertaken by HRP's Trustees.

### **13. Document Controls**

#### 13.1 Policy review procedure

The Human Remains Policy will be reviewed and published from time to time, at least once every five years. The Policy is next due for review on or before July 2029.