

## **AAAC guidelines for the management of skeletal collections retained and stored by anatomy departments in the UK and Ireland.**

This document was prepared by members of the Institute of Anatomical Sciences (IAS) and submitted to the Anatomy Associations Advisory Committee (AAAC) for distribution to the three member Society's Councils (Anatomical Society (AS), British Association of Clinical Anatomists (BACA) and the Institution of Anatomical Sciences (IAS) for further comment prior to being issued to all three Society's for inclusion on their websites.

### **1. Dignity and Respect for Osteological Remains**

Osteological collections held by Anatomy Academic departments and Units often consist of an anonymous archive of articulated skeletons, half skeleton sets and isolated bones that are likely to be derived from the pre-1985 India Bone Trade. All members of the Learned Societies who undertake Anatomical Examination recognise that these osteological preparations are the remains of individuals, and, whilst they are exempt from the consent requirements of the Human Tissue Act 2004 (England, Wales and Northern Ireland) <sup>[1]</sup>, the Anatomy Act 1984 <sup>[2]</sup> and Human Tissue Act (Scotland) 2006 <sup>[3]</sup>, and Human Tissue (Transplantation, Post-Mortem, Anatomical Examination and Public Display) Act 2024 <sup>[4]</sup>, they should be treated with dignity and respect.

### **2. Procurement of Osteological Material**

In England, Wales and Northern Ireland, the use, storage and disposal of human tissue is regulated by the Human Tissue Authority (HTA). The HTA's remit is defined in the Human Tissue (HT) Act 2004 <sup>[1]</sup>, including the activities it licenses that are relevant to anatomy departments and units. The HT Act and the HTA's Codes of Practice <sup>[5]</sup>, need to be considered when dealing with skeletons in an educational context. Under Section 32 of the HT Act, it is an offence to take part in commercial dealings in 'controlled material', but the HTA's remit does not extend to the selling or purchasing of skeletons.

In Scotland, the use, storage and disposal of human tissue is regulated by the Anatomy Act 1984 <sup>[2]</sup> and the Human Tissue (Scotland) Act 2006 <sup>[3]</sup>. In Scotland, the role of His Majesty's (HM) Inspector of Anatomy continues, unlike changes in the law in England, Wales and Northern Ireland. Under Section 20 of the Human Tissue (Scotland) Act 2006, it is an offence to take part in commercial dealings in 'controlled material', but the HM Inspector of Anatomy's remit does not extend to the selling or purchasing of skeletons.

In Ireland, the Human Tissue (Transplantation, Post-Mortem, Anatomical Examination and Public Display) Act 2024 <sup>[4]</sup> is a composite piece of legislation that includes provisions relating to donation and transplantation of organs, tissues, and cells, post-mortem practice and procedures, anatomical examination, and public display of bodies after death. At the time of writing these guidelines, the Act is being implemented in phases, and the Codes of Practice for anatomical examination will follow in due course. These guidelines will be reviewed as that guidance is published.

It is considered to be best practice not to engage with unverified and/or commercial suppliers of human osteological material, and rely upon the donation of osteological material from those who legitimately purchased skeletons from reputable and long-established companies in the past, legacy collections, or through the preparation of osteological material from material donated for Anatomical Examination through formal Body Donation Programmes. The AAAC supports the BABAO's (The British Association for Biological Anthropology and

Osteoarchaeology) Statement on the sale of human remains <sup>[6]</sup>. The BABAO's stance on the selling and trade of human remains is as follows:

“BABAO believes that the sale of human remains is unethical and does not condone the selling of or trade in human remains. For individuals or organisations that have human remains and wish to transfer them, BABAO can offer advice on institutions that are willing to receive remains for education, training or research, which adhere to our ethical standards and are appropriately licensed where necessary” (British Association for Biological Anthropology and Osteoarchaeology, 2023).

When accepting donations of skeletal remains from the general public, it is essential to document the provenance to ensure compliance with all relevant legislation and guidelines. Transparency in these processes safeguards against ethical breaches, and supports the integrity of academic programmes. Provenance should detail the origin of the remains, how they were obtained, and document any permissions granted by donors, where possible.

### **3. Repatriation Requests**

Occasionally, anatomy departments and units may receive requests for the repatriation of skeletal remains, particularly in cases where remains have cultural or ancestral significance. Each request should be considered on a case-by-case basis, with a commitment to transparency and sensitivity. Key factors to consider include the provenance of the remains, legal ownership, and the cultural and ethical implications of retaining or returning them.

The AAAC strongly recommends that those receiving repatriation requests collaborate with other units and other allied organisations, such as the [British Museum](#), the [Natural History Museum](#), [English Heritage](#), the [Museum of London](#), and the [Wellcome Trust](#), who may be able to provide additional guidance to ensure an appropriate and respectful resolution.

### **4. Storing and labelling osteological material**

The proper storage of skeletal remains is critical to preserving their condition and ensuring continued accessibility for teaching and research. Remains should be stored in an appropriate environment to reduce degradation. To avoid physical damage, remains should be stored in appropriately sized protective containers.

Individual bones should be labelled where possible, but a pragmatic approach should be adopted in terms of labelling smaller bones. Non-invasive labelling methods should be undertaken to ensure that no permanent or damaging marks are made to the bones. An auditable inventory of bones is sufficient to maintain HTA-compliance. An inventory of bones should identify the type of bone (e.g. right humerus, left full articulated upper limb bones etc.), the total number of that bone within the container, and where that bone is stored.

Whatever approach to labelling is taken, traceability should be robust. Individual bones and fragments may not need to be labelled if there is a robust audit trail in place.

### **5. Sensitive disposal of osteological material**

The disposal of human skeletal material should be undertaken only when necessary and conducted sensitively and in line with established institutional practices for the disposal of retained parts. Documentation of disposal should be retained.

## 6. Further Information

The Department for Culture, Media and Sport (DCMS) issued Guidance on the Care of Human Remains in Museums <sup>[7]</sup> following the 2003 report by the DCMS Working Group on Human Remains and the subsequent 2004 consultation on that document. This comprehensive document covers the legal and ethical framework arising from the care and use of human remains, and their curation. The AAAC strongly recommends that this guidance document be consulted in the drafting of any Policies and Procedures relating to the use and storage of osteological material held in permanent collections.

Additionally, the guidance provided by DCMS in 2005 offers a framework for institutions to handle claims from indigenous or affiliated groups sensitively, balancing scientific value with ethical obligations. Notable examples include the repatriation of Māori and Moriori remains to New Zealand, reflecting a broader commitment to reconciliation and restorative justice <sup>[8]</sup>.

Section 47 of the HT Act allows key national museums to remove human remains from their collections if they are reasonably believed to be remains of a person who died less than 100 years before the section came into force. The British Museum holds and cares for human remains from around the world, and has published a collection of essays that includes information on the care and conservation of human remains <sup>[9]</sup>.

The documents above were heavily consulted during the preparation of these guidelines.

## 7. Conclusions

In practice, this means that skeletal material should only be used for teaching, research and educational purposes, so access to this skeletal material should be limited to members of staff or students who understand the ethical considerations of working with human remains. If the institution has an appropriate licence then they can be used for public display.

Further information and guidance should be sought by institutions when receiving donated material, repatriation requests and when considering the sensitive disposal of human remains.

## 8. References

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