



Department
for Culture,
Media & Sport

Export of Objects of Cultural Interest 2024-25



ARTS COUNCIL
ENGLAND



Department
for Culture,
Media & Sport

Export of Objects of Cultural Interest 2024-25

Presented to Parliament pursuant to Section 10 (1) (a) of the Export Control Act 2002.

July 2025





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Cover image: The Sutton Scotney Iron Age Brooch. The brooch was donated to Hampshire Cultural Trust for the museum collections owned by Hampshire County Council, by Costas Paraskevaides and Jethro Sverdloff, on behalf of ArtAncient Ltd.



Department
for Culture,
Media & Sport

Export of Objects of Cultural Interest 2024-25

1 May 2024 to 30 April 2025

- I Report of the Secretary of State
- II Report of the Reviewing Committee on the Export of Works of Art
and Objects of Cultural Interest



Annual Report to Parliament

By the Secretary of State for Culture, Media & Sport and the Minister for Creative Industries, Arts and Tourism

The Reviewing Committee on the Export of Works of Art and Objects of Cultural Interest

We are pleased to lay before Parliament the 70th annual report of the Reviewing Committee on the Export of Works of Art and Objects of Cultural Interest covering the period 1 May 2024 to 30 April 2025.

The safeguarding of our most significant art treasures against potential export is not merely an administrative task but one of the cornerstones of our cultural identity and national pride. The export-deferral process helps to ensure that these irreplaceable items, which hold profound historical and cultural significance, remain within our national collections where they can continue to educate, inspire, and enrich the lives of our citizens and visitors.

As noted by Mr Hochhauser, the Committee's Chair, of the 18 items that were found to meet the Waverley criteria for this reporting year, six have resulted in successful acquisitions by UK institutions so far. They are all important but two of these stood out for us and for different reasons. The needlework sampler of the Menai Bridge by the 11-year-old Mary Anne Hughes is not only a wonderful representation of this iconic Welsh landmark but also a window into the world of early 19th-century working-class education and female accomplishment.

The notebooks of Alan Turing, the man generally accepted to be the founder of computer science, are truly outstanding. Evidence of his process has rarely survived and these papers are particularly noteworthy in that they reveal some of his most inventive, secret, and overlooked work. The papers were

successfully acquired by the Turing Archive at King's College, Cambridge where they will be studied and enjoyed.

It is important that, in considering export licence applications, we look carefully at the provenance of the items. In some cases, provenance information is plentiful but in others may be lacking, often for legitimate reasons where records do not exist and research has failed to uncover anything further. As Mr Hochhauser notes, my Department commissioned an independent research project on provenance issues in relation to the export licensing system. This follows a number of cases where the Committee's progress was affected by concerns over provenance. We are grateful to the Committee for its valuable contribution to this work, the results of which have now been published.

We are very grateful to Mr Hochhauser and the members of the Reviewing Committee for their dedication and invaluable advice. They have been brilliantly supported, as always, by Arts Council England. We would also like to thank the many expert advisers and funding organisations for their contribution to this process. It is only through their unwavering support, coupled with the tireless efforts of museum staff, volunteers, and benefactors throughout the United Kingdom, that we are able to preserve and enrich our public collections with the wonderful kinds of items that we see illustrated in this report. Their combined endeavours ensure that future generations will continue to benefit from and appreciate the rich tapestry of our artistic and cultural inheritance.

The Rt Hon Lisa Nandy MP

Secretary of State for Culture, Media and Sport

Sir Chris Bryant MP

Minister for Creative Industries, Arts and Tourism

Operation of the Control

The following figures cover the period of this report (1 May 2024 to 30 April 2025)

| | | 1 May 2023 – 30 April 2024 | 1 May 2024 – 30 April 2025 |
|-----|--|---------------------------------------|---------------------------------------|
| (a) | Number of applications for individual export licences ¹ | 5,035 | 5,745 |
| (b) | Number of above applications which were for manuscripts, documents or archives | 1,472 | 1,506 |
| (c) | Number of items licensed after reference to expert advisers on the question of national importance | 30,519 | 28,307 |
| (d) | Total value of items in (c) | £1,063,805,361 | £955,143,117 |
| (e) | Number of Open Individual Export Licences (OIEL) in operation having been issued in previous years to regular exporters for the export of (i) manuscripts, documents, archives and photographic positives and negatives; (ii) objects imported into the UK in the past 50 years; (iii) UK origin coins; (iv) the temporary export of objects owned by or under the control of UK public collections | 64 | 65 |
| (f) | Number of items licensed after the Arts Council England was satisfied of import into the UK within the past 50 years | 3,930 | 3,357 |
| (g) | Total value of items in (f) | £6,651,243,600 | £10,318,227,385 |
| (h) | Number of items in (f) which were manuscripts, documents and archives | 1,122 | 1,242 |
| (i) | Total value of items in (h) | £103,013,838 | £82,652,611 |
| (j) | Number of items given an EU licence without reference to the question of national importance because they were either: valued at below the appropriate UK monetary limit; manuscripts valued at £1,500 or less or coins valued at £500 or less and the exporter held a valid OIEL; musical instruments exported for less than six months for use in the course of work by a professional musician; a motor vehicle exported for less than six months for social, domestic or pleasure purposes; a foreign registered motor vehicle exported following importation for less than six months for pleasure purposes; imported into the UK in the last 50 years or owned by a museum or gallery that had an OIEL and were being exported on a temporary basis ² | 0 | 0 |
| (k) | Total value of items in (j) | £0 | £0 |

¹ One application may cover several items.

² Following the end of the EU Exit transition period on 31 December 2020, the UK ceased issuing EU licences for cultural goods with the exception of goods being exported from Northern Ireland directly to non-EU countries. No EU licences were issued in the reporting period 1 May 2024 – 30 April 2025.

Report of the Reviewing Committee on the Export of Works of Art and Objects of Cultural Interest

1 May 2024 to 30 April 2025

To:

The Rt Hon Lisa Nandy MP
Secretary of State for Culture, Media and Sport

70th Report of the Reviewing Committee

Members of the Committee 2024–25

Mr Andrew Hochhauser KC (Chair)

Mr Christopher Baker

Mr Mark Hallett

Ms Helen Jacobsen

Mr Stuart Lochhead

Mr Tim Pestell

Ms Caroline Shenton

Ms Pippa Shirley

Secretary

Ms Mafalda Raposo

Postal Address

Secretary

Reviewing Committee on the Export of Works of Art
and Objects of Cultural Interest

Arts Council England

21 Stephen Street

London W1T 1LN

**A register of interests held by Committee members is posted on
Arts Council England's website: www.artscouncil.org.uk**

Report prepared by:

Eleanor Maxwell

Mafalda Raposo

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Part I:

Reviewing Committee Report for 2024-25

1 May 2024 to 30 April 2025

Introduction

During this reporting year, which started on 1 May 2024, the Committee met 11 times and considered 20 objects referred to us. We found that 18 objects met one or more of the Waverley criteria and recommended that the Secretary of State should defer the export licences to allow an offer to acquire them from a UK institution or private source. From the cases we considered this year, two did not meet any of the Waverley Criteria. Three cases considered by the Committee are still under deferral, and nine cases have not received any serious expressions of interest.

I am delighted to report that from the export deferred cases, six have been acquired to date and saved for the nation for future generations to enjoy.

One successful acquisition to highlight, featured in the report cover, is the Sutton Scotney Iron Age Brooch. The Committee considered this a wonderful object and was delighted to learn it had been donated to Hampshire Cultural Trust for the museum collections owned by Hampshire County Council, by Costas Paraskevaides and Jethro Sverdloff, on behalf of ArtAncient Ltd.

As we did last year, the Committee is proud to present some case studies of objects acquired via the export deferral process. The Committee found it inspiring to see the lives of these objects after acquisition and the impact

they have for the museums concerned and their audiences. This year, we highlight the partnership work of Tate and the Museum of the Home and their joint acquisition of *A Young Teacher* by Rebecca Solomon and also Compton Verney's display of the *Two Women Wearing Cosmetic Patches*.

Provenance:

Last year, DCMS commissioned a research project into provenance issues related to export licensing from the Institute of Art & Law (IAL) and Tennant McQuillan LLP. The research was commissioned in response to the Committee's long-held concerns about the complex challenges of applying appropriate provenance requirements to the export licensing process.

The Committee was pleased to be invited to contribute their views to the research, and myself, Tim Pestell, and Mark Hallett met with Alex Herman, Emily Gould, and Anastasia Tennant to discuss it and answer a series of questions. In addition, the Advisory Council discussed the topic at last year's meeting. All the findings from the roundtable discussions were provided to IAL to assist the research.

Although issues of provenance may affect the work of the Committee, for example in determining whether Waverley 1 is satisfied, the public often does not fully understand that its remit is solely to assess objects against the Waverley criteria.

Images of objects for press releases:

The Committee would like to encourage applicants to provide high quality images of the objects being considered by the Committee. It is important to have images that convey the object well and can be used in the Secretary of State's press release if the object is deferred. Particularly with 3D objects, it is extremely valuable to receive several images showing the object from different angles and in detail so that interested parties can consider it fully.

Documents Working Party:

The Working Party on Manuscripts, Documents, and Archives is an advisory body to the Reviewing Committee. It met on 30 April 2025 to consider export issues related to manuscripts, documents, and archives.

The Working Party considered a paper from Arts Council England, which provided background and advice on whether copies of manuscripts were sufficient to satisfy the national interest, if the expert adviser considers that the object could potentially meet the Waverley criteria. The Party considered the advice and will be making a recommendation to the RCEWA that, in all cases, the decision on whether copies would be sufficient should be for the Secretary of State. It is not within the expert adviser's or the RCEWA's remit to consider any other elements, and only the Waverley Criteria should be considered.

The Working Party was also pleased to hear from one of its members that the Export Licensing Online system, which launched in August 2024, is working well and is highly valued by the trade.

The Working Party continued its efforts to raise awareness of the export regime relating to archives and manuscripts, including the publication of articles in the Law Society and in the Antiques Trade Gazette.

Advisory Council:

The Advisory Council met on 5 June 2025 and considered the draft policy for the Reviewing Committee's 2024-25 Annual Report. There were no comments from the Council on the Policy section of this report. At its meeting, the Council also discussed the recommendations of the Export Licensing Provenance Research report. The Secretariat will collate the feedback and provide it to DCMS.

The Council members were also delighted to hear from Storiell, Bangor, on their acquisition of a needlework sampler of Menai Bridge, Anglesey, which the Committee is reporting on this year, and is now on display in Wales for future generations to enjoy.

Finally, on behalf of the Committee, I would like to express our gratitude to everyone who participates in this process and assists us in preserving objects for the nation.

Andrew Hochhauser KC

Chairman, Reviewing Committee on the Export of Works of Art and Objects of Cultural Interest

Part II: Cases referred to the Committee

In 2024-25, the Committee considered 20 objects because the appropriate expert adviser had objected to their proposed export on the grounds of national importance.

The Committee will designate an object as a 'national treasure' if it considers that its departure from the UK would be a misfortune on one or more of the following three grounds, collectively known as the Waverley criteria:

| History | Aesthetics | Scholarship |
|---|--|--|
| Is it closely connected with our history and national life? | Is it of outstanding aesthetic importance? | Is it of outstanding significance for the study of some particular branch of art, learning or history? |
| Waverley 1 | Waverley 2 | Waverley 3 |

Items found to be national treasures

18 items were found to meet at least one of the Waverley criteria:

Case 1 A Louis XIV table top, attributed to Bernard Perrot d'Orléans

Case 2 *A History of the Birds of Europe*, H. E. Dresser

Case 3 Marching banner commemorating the Slavery Abolition Act 1833

Case 4 Coin found in UK soil, a new Iron Age Ruler

Case 5 The Delilah Project: working papers, Alan Turing

Case 6 *La Rêve de L'Artiste* by Antoine Watteau

Case 7 Celtic gold twisted torc, British

Case 8 A needlework sampler of Menai Bridge, Anglesey by Mary Anne Hughes, age 11

Case 9 Roman mosaic with geometric pelta pattern

Case 10 Roman geometric monochrome mosaics

Case 11 *Sculpture with Colour (Oval Form) Pale Blue and Red* by Dame Barbara Hepworth

Case 13 The Fairhaven Panels: A Polyptych with Mars, Virtù Invincibile, Minerva and Magnificence, De Vély

Case 14 The Sutton Scotney Iron Age Brooch

Case 15 Early Anglo Saxon Gold and Garnet Cloisonné Panel, trapezoidal form

Case 17 *Sir William Young Conducting a Treaty with the Black Caribs on the Island of St Vincent, 1773* by Agostino Brunias

Case 18 *A family of Charaibes in the Island of St Vincent* by Agostino Brunias

Case 19 *The Virgin and Child enthroned* by Alessandro di Mariano Filipepi, called Sandro Botticelli

Case 20 *Cimon Falling in love with Efigenia* by Peter Paul Rubens

Items found not to be national treasures

Two items were found not to meet any of the Waverley criteria.

Case 12 Relic gems from the Piprahwa stupa, India

Case 16 *An Indian Encampment with Elephants* by Johann Zoffany

National treasures referred to the Secretary of State

18 cases were referred to the Secretary of State for deferral, and the Secretary of State accepted the Committee's recommendations on all of them. The aggregate value of the 18 deferred items was £40 million (£40,009,133).

Deferred items that were acquired

Of the 18 deferred items, the following six were acquired by institutions or individuals in the United Kingdom:

- Case 2** *A History of the Birds of Europe*, H. E. Dresser
- Case 4** Coin found in UK soil, a new Iron Age Ruler
- Case 5** The Delilah Project: working papers, Alan Turing
- Case 8** A needlework sampler of Menai Bridge, Anglesey by Mary Anne Hughes, age 11
- Case 14** The Sutton Scotney Iron Age Brooch
- Case 15** Early Anglo Saxon Gold and Garnet Cloisonné Panel, trapezoidal form

These had a total value of £586,132, which represents 1.5 per cent of the total value of objects that were deferred and 33.3 per cent of the total number.

Outstanding cases

At the time of writing this Report, three items with a total value of £22,453,981 were still under deferral.

- Case 11** *Sculpture with Colour (Oval Form) Pale Blue and Red* by Dame Barbara Hepworth
- Case 19** *The Virgin and Child enthroned* by Alessandro di Mariano Filipepi, called Sandro Botticelli
- Case 20** *Cimon Falling in love with Efigenia* by Peter Paul Rubens

National treasures that were not saved

Unfortunately, it was not possible to retain in the UK every national treasure that was deferred. Export licences were (or can be) issued for the nine items listed below:

- Case 1** A Louis XIV table top, attributed to Bernard Perrot d'Orléans
- Case 3** Marching banner commemorating the Slavery Abolition Act 1833
- Case 6** *La Rêve de L'Artiste* by Antoine Watteau
- Case 7** Celtic gold twisted torc, British
- Case 9** Roman mosaic with geometric pelta pattern
- Case 10** Roman geometric monochrome mosaics
- Case 13** The Fairhaven Panels: A Polyptych with Mars, Virtù Invincibile, Minerva and Magnificence, De Vély
- Case 17** *Sir William Young Conducting a Treaty with the Black Caribs on the Island of St Vincent, 1773* by Agostino Brunias
- Case 18** *A family of Charaibes in the Island of St Vincent* by Agostino Brunias

These had a collective value of £17 million (£16,969,020), which represents 42.4 per cent of the total value of objects placed under deferral and 50 per cent of the total number.

Individual export cases 2024-25

CASE 1 A Louis XIV table top, attributed to Bernard Perrot d'Orléans

Object: A table top made of panels of millefiori, lampworked and cast glass set onto a copper base with repoussé gilt-brass surrounds. It was made between 1668-1681 and attributed to Bernard Perrot (1640-1709). 117 cm x 81 cm.

Export licence application:

The applicant had applied to export the table top to the USA. The value on the export licence application was £7,500,000, which represented the purchase price.

The Curator, Ceramics & Glass, 1600-1800 at the V&A objected to the export of the table top under the second and third Waverley criteria and acted as expert adviser.

The applicant did not dispute that the table top met the Waverley criteria.

Committee meeting:

The Committee heard this case in May 2024 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Suzanne Higgott; Errol Manners; and John Whitehead

who became temporary members of the Committee for this case.

Waverley 1? The Committee did not consider the table top to meet the first Waverley criterion.

Waverley 2? The Committee agreed that the table top met the second Waverley criterion. They noted that the table top was a remarkable combination of scientific and technical work with great aesthetic impact.

Waverley 3? The Committee agreed that the table top met the third Waverley criterion for its outstanding significance to the study of the work of Bernard Perrot and other émigré glassmakers working in France in the 17th century. They agreed its iconography, ownership history, and the study of French 17th-century interiors would also be fascinating research angles.

Outcome:

The Committee recommended that a decision on the export licence should be deferred for four months to enable an offer to purchase the table top to be made at the agreed fair market price of £7,500,000 (plus VAT of £300,000). There would have been a second deferral period of six months if there were a serious expression of interest and the owner granted an Option Agreement.

At the end of the first deferral period, no offer to purchase the table top had been made. An export licence was therefore issued.



Case 1 A Louis XIV table top, attributed to Bernard Perrot d'Orléans

CASE 2 *A history of the birds of Europe*, H. E. Dresser

Object: *A History of the Birds of Europe, including all the species inhabiting the Western Palaearctic Region* published 1871-96 by H.E. Dresser (1838-1915). 17 volumes comprising 9 volumes of text (including index and supplement) and 8 volumes of plates. The volumes include additional wood engraved titles, containing the 721 hand-coloured lithographic plates by J. G. Keulemans, Joseph Wolf, Archibald Thorburn, and Edward Neale. This was the author's own unique copy.

Export licence application:

The applicant had applied to export the volumes to the USA. The value on the export licence application was £137,477.50. This represented the hammer price at auction (£100,000) plus the buyer's premium (£26,000) plus the overhead premium (£1,000). The value also included a U.S. state sales tax of £10,477.50 which would not be payable in the event of a UK sale.

The Library Special Collections Manager at the Natural History Museum objected to the export of the volumes under the first and second Waverley criteria and acted as the expert adviser.



The applicant disputed that the volumes met any of the Waverley criteria.

Committee meeting:

The Committee heard this case in May 2024 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Jonathan Elphick; Christopher Mills; and Anthony Payne who became temporary members of the Committee for this case.

Waverley 1? The Committee agreed that H.E. Dresser was highly regarded. However, by a majority, it was found that the volumes weren't significant enough to be of outstanding importance to our history and national life.

Waverley 2? Although the Committee agreed that Dresser's technique of having the artists draw directly onto the lithographic stone added to the scholarly significance of the original volumes, they did not find the volumes to be of outstanding aesthetic importance.

Waverley 3? The Committee agreed that the volumes met the third Waverley criterion, even though the expert adviser had originally only argued for the first and second criteria. They found the volumes unique because they were the

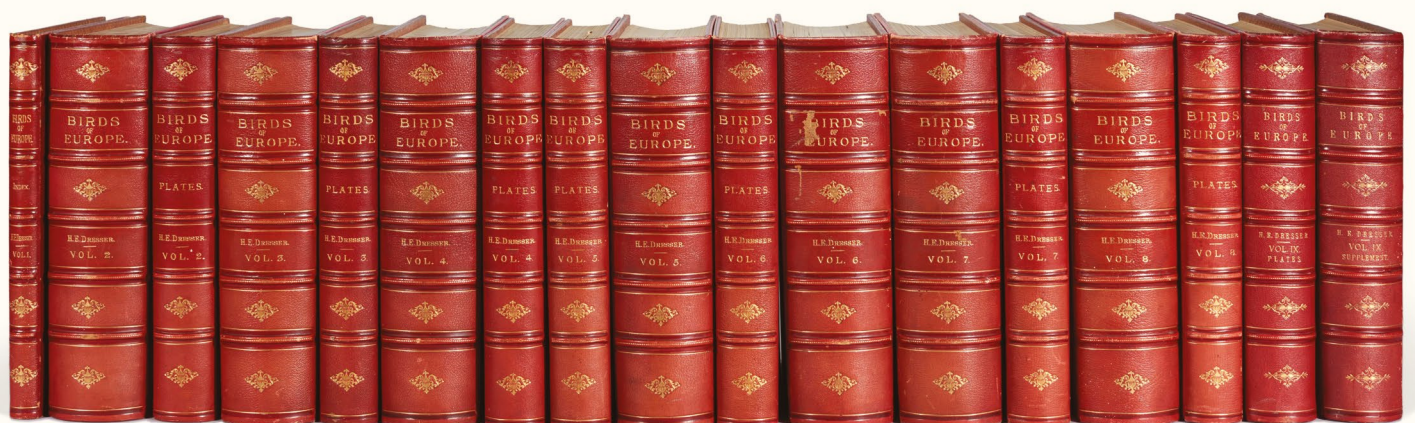
original "master" lithographs and included annotations from the author. They noted that having Dresser's own annotated volumes alongside his collection of bird specimens which are in public collections in the UK would provide valuable research opportunities.

Outcome:

The Committee recommended that a decision on the export licence should be deferred for three months to enable an offer to purchase the volumes to be made at the agreed fair market price of £127,000. There would be a second deferral period of three months if there were a serious expression of interest and the owner granted an Option Agreement.

During the first deferral period, Manchester Museum submitted a serious expression of interest to acquire the volumes. The owner accepted the offer and granted Manchester Museum an Option Agreement. The decision on the export licence application was therefore deferred for a further three months.

Manchester Museum and The John Rylands Library, cultural institutions of the University of Manchester, acquired the volumes for £127,000 with support from Art Fund, Arts Council England/V&A Purchase Grant Fund, Friends of the Nations' Libraries, and the University of Manchester.



Case 2 A history of the birds of Europe

CASE 3 Marching banner commemorating the Slavery Abolition Act 1833

Object: A marching banner commemorating the abolition of slavery on 1 August 1834. The banner is made from dark blue cotton lettered in gold, with silk tassels and the original wooden dowel hanger. 97 cm x 89 cm.

Export licence application:

The applicant had applied to export the banner to the USA. The value on the export licence application was £45,000, which represented the proposed sale price.

The Keeper, Britain, Europe & Prehistory at the British Museum objected to the export of the banner under the first and third Waverley criteria and acted as expert adviser.

The applicant did not dispute that the banner met any of the Waverley criteria.

Committee meeting:

The Committee heard this case in May 2024 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Matthew J Smith, Cassandra Gooptar, and Donovan Rees

who became temporary members of the Committee for this case.

Waverley 1? By a majority, the Committee found that the banner met the first Waverley criterion. The banner was a striking object that had the potential to highlight the global movements around the abolition of slavery, which originated in Britain. The Committee noted that there were no known similar surviving objects from this incredibly important era of British history.

Waverley 2? The Committee did not consider the banner to meet the second Waverley criterion.

Waverley 3? The majority of the Committee agreed that the banner met the third Waverley criterion. There was much to learn about the origin of the banner, and how and by whom it would have been displayed.

Outcome:

The Committee recommended that a decision on the export licence should be deferred for two months to enable an offer to purchase the banner to be made at the agreed fair market price of £45,000 (plus VAT of £9,000). There would have been a second deferral period of three months if there were a serious expression of interest and the owner granted an Option Agreement.

At the end of the first deferral period, no offer to purchase the banner had been made. An export licence was therefore issued.



CASE 4 Coin found in UK soil, a new Iron Age Ruler

Object: A gold Iron Age coin found in 2023 in the Test Valley, Hampshire, England. The coin bears an inscription: IISVNIIRTOS (Esunertos). 12.65 mm x 11.75 mm x 2.65 mm.

Export licence application:

The applicant had applied to export the coin to the USA. The value on the export licence application was £20,040, which represented the hammer price at auction (£17,000) plus the buyer's premium (£3,040).

The Curator, Later European Prehistory at the Ashmolean Museum, University of Oxford objected to the export of the coin under the first and third Waverley criteria and acted as expert adviser.

The applicant did not dispute that the coin met any of the Waverley criteria.

Committee meeting:

The Committee heard this case in May 2024 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: John Creighton;

Dominic Chorney; and Colin Haselgrove who became temporary members of the Committee for this case.

Waverley 1? The Committee agreed unanimously that the coin met the first Waverley criterion. It was one of the earliest known inscribed names on a coin in the British record and was therefore of outstanding significance to the history of people in Britain.

Waverley 2? The Committee did not consider the coin to meet the second Waverley criterion.

Waverley 3? The Committee agreed that the coin met the third Waverley criterion as the research opportunities were enormous and would potentially unlock previously unknown aspects of our history. Further study may also expand the knowledge and context around other Iron Age coins currently in UK collections.

Outcome:

The Committee recommended that a decision on the export licence should be deferred for two months to enable an offer to purchase the coin to be made at the agreed fair market price of £20,040 (plus VAT of £680). There would be a second deferral period of three months if there were a serious expression of interest and the owner granted an Option Agreement.

During the first deferral period, Arts Council England received two serious expressions of interest to acquire the coin. The owner accepted the offer submitted by the British Museum and granted them an Option Agreement.

The British Museum acquired the coin for £20,040 (plus VAT of £680) with support from Tim Wright.



Case 4 Coin found in UK soil, a new Iron Age Ruler

CASE 5 The Delilah Project: working papers, Alan Turing

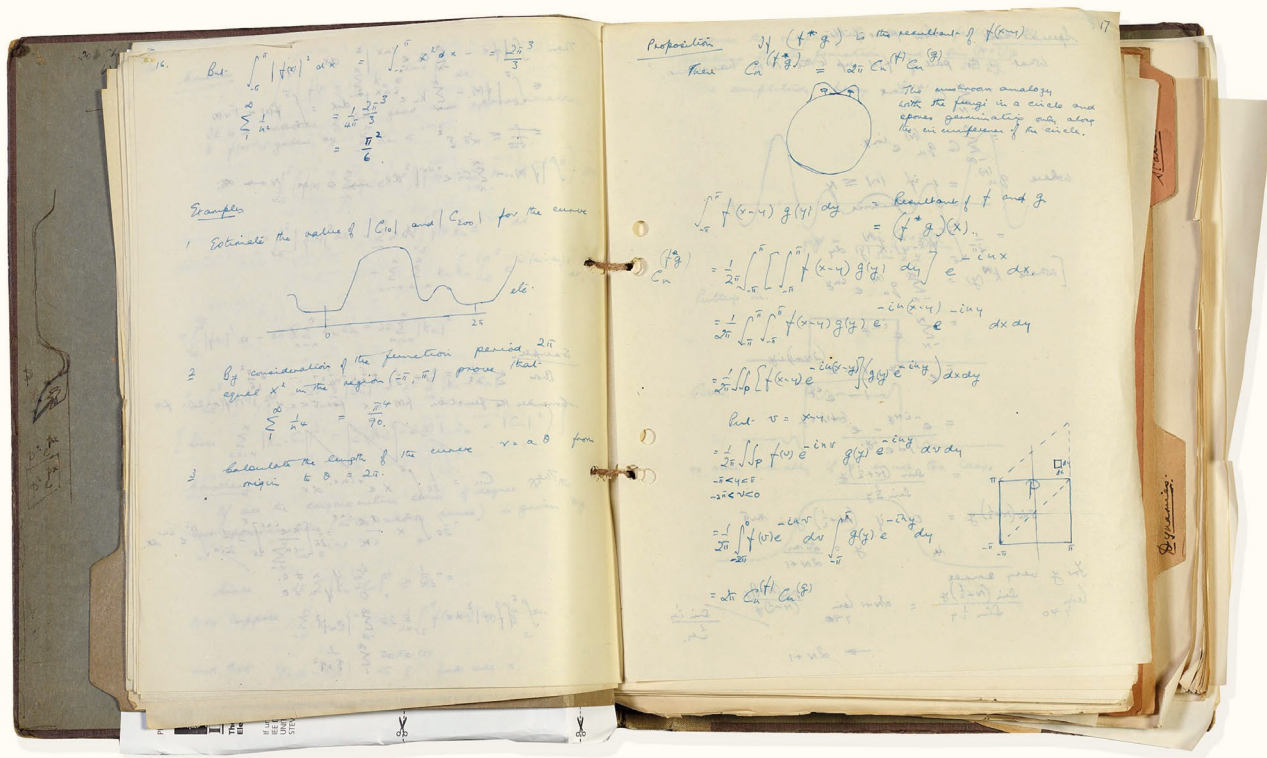
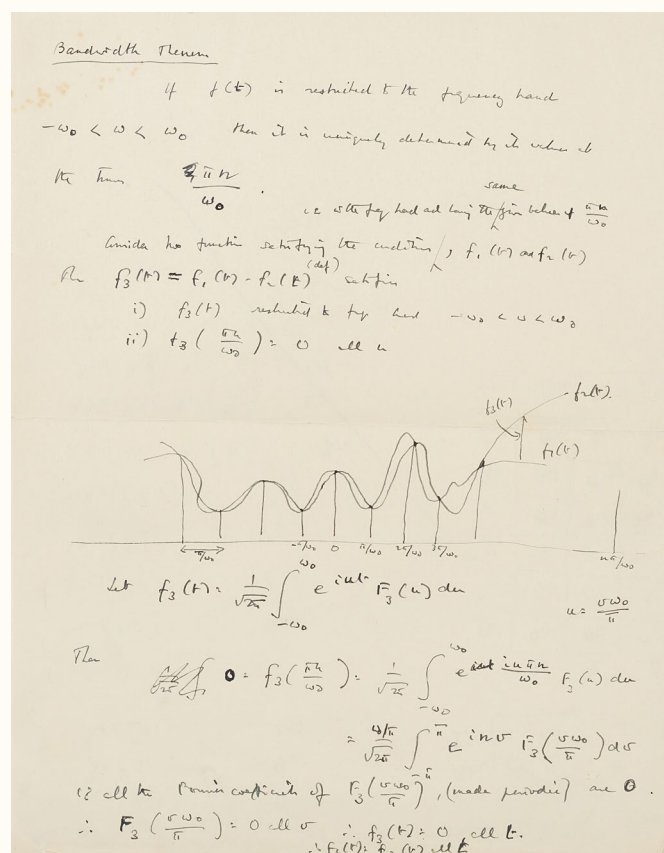
Object: Two bound notebooks and six separate gatherings of loose paper sheets comprising the papers of Alan Turing (1912-54) and Donald Bayley (1921-2020) relating to the World War Two project 'Delilah'. The papers date principally from 1943 to 1945, with some later additions.

Export licence application:

The applicant had applied to export the papers to the USA. The value on the export licence application was £397,680, which represented the hammer price at auction (£300,000) plus the buyer's premium (£97,680).

The Head of Modern Archives and Manuscripts at the British Library objected to the export of the papers under the first and third Waverley criteria and acted as expert adviser.

The applicant disputed that the papers met any of the Waverley criteria.



Committee meeting:

The Committee heard this case in June 2024 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Edward Maggs; James Peters; and Katrina Dean who became temporary members of the Committee for this case.

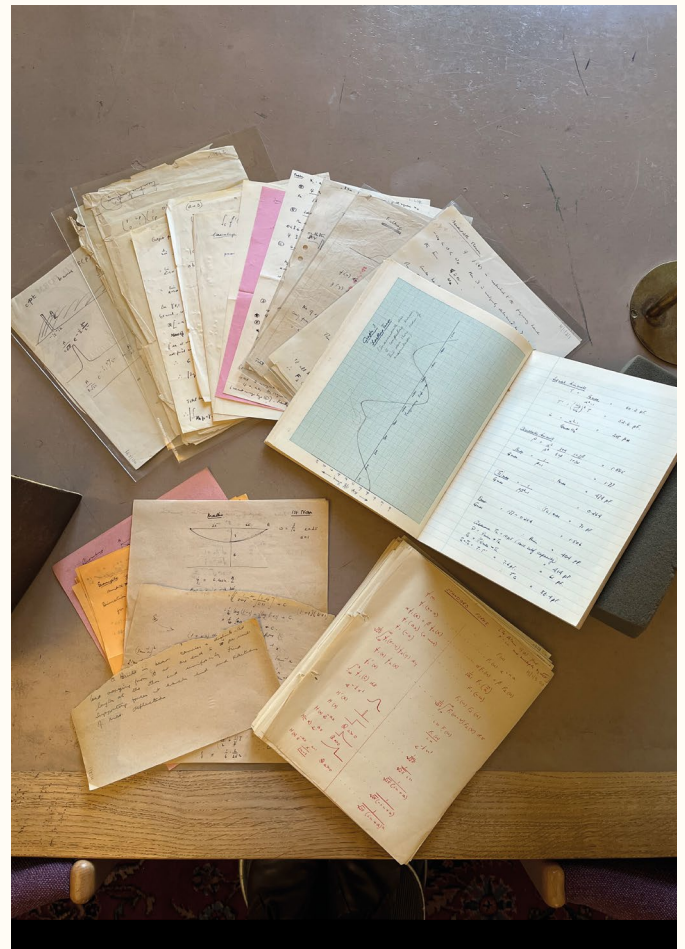
Waverley 1? The Committee all agreed that the papers met the first Waverley criterion. They agreed that this was a rare and important collection from one of Britain's most important and influential scientists, and potentially the only surviving technical manuscript in Turing's own hand.

Waverley 2? The Committee did not consider the papers to meet the second Waverley criterion.

Waverley 3? The Committee agreed that the papers met the third Waverley criterion as the collection included technical details of Turing's research that would not normally be seen by the public, and furthermore, had not been seen or used by researchers in the field. They noted that the Delilah Project was not as well recognized as the more famous Enigma, so they considered this to be a source of incredible insight into Turing's working habits. The Committee agreed that the material provided unique insight into early voice innovation such as speech coding and was therefore of significant relevance to modern technology.

Outcome:

The Committee recommended that a decision on the export licence should be deferred for three months to enable an offer to purchase the papers to be made at the agreed fair market price of £397,680 (inclusive of VAT). There would be a second deferral period of four months if there were a serious expression of interest and the owner granted an Option Agreement.



The Delilah Project: working papers, Alan Turing.
Photo by Thomas Davies © King's College, Cambridge

During the first deferral period, Arts Council England received two serious expressions of interest to acquire the papers. The owner accepted the offer submitted from Kings College, Cambridge and granted them an Option Agreement. The decision on the export licence application was therefore deferred for a further four months.

Kings College, Cambridge acquired the papers for £397,680 with support from Friends of the Nations' Libraries, the National Heritage Memorial Fund, trading firm XTX Markets, and King's College.

CASE 6 *La Rêve de L'Artiste* by Antoine Watteau

Object: *La Rêve de l'Artiste (The Dream of the Artist)*, painted about 1710 by Antoine Watteau (1684–1721). Oil on canvas. 95.5 cm x 121 cm

Export licence application:

The applicant had applied to export the painting to the USA. The value on the export licence application was £6,075,000, which represented a private sale price.

The Director at the National Gallery objected to the export of the painting under the first and second Waverley criteria and acted as expert adviser.

The applicant disputed that the painting met any of the Waverley criteria.

Committee meeting:

The Committee heard this case in July 2024 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Xavier Bray; Mark Evans; and Tim Hunter who became temporary members of the Committee for this case.

Waverley 1? The Committee agreed that, while the provenance was interesting, the fact the painting was in Lord Walpole's collection was not significant enough for it to meet the first Waverley criterion.

Waverley 2? The majority of the Committee agreed that the painting did not meet the second Waverley criterion. However, they noted how fascinating and moving it was, particularly as one of the first known examples of dream imagery by the artist.

Waverley 3? The Committee unanimously agreed that the painting met the third Waverley criterion, even though the expert adviser had put forward arguments for only the first and second criteria. They noted that the painting offered intriguing insight into British taste and culture in the 18th century, particularly due to its potential female ownership, as the painting had hung in Lady Walpole's dressing room in Downing Street.

Outcome:

The Committee recommended that a decision on the export licence should be deferred for three months to enable an offer to purchase the painting to be made at the agreed fair market price of £6,075,000 (plus VAT of £215,020). There would have been a second deferral period of six months if there were a serious expression of interest and the owner granted an Option Agreement.

At the end of the first deferral period, no offer to purchase the painting had been made. An export licence was therefore issued.



CASE 7 Celtic gold twisted torc, British

Object: A simple twisted gold torc created from two wires twisted and plied together with a single, round, looped terminal at either end. Length 287mm, diameter 72mm.

Export licence application:

The applicant had applied to export the torc to France. The value on the export licence application was £45,000, which represented an estimate.

The Keeper, Department of Britain, Europe & Prehistory at the British Museum objected to the export of the torc under the third Waverley criterion and acted as expert adviser.

The applicant did not dispute that the torc met any of the Waverley criteria.

Committee meeting:

The Committee heard this case in June 2024 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Georgiana Aitken; Judith Nugée; and Jody Joy who became temporary members of the Committee for this case.

Waverley 1? The Committee did not consider the torc to meet the first Waverley criterion.

Waverley 2? The Committee did not consider the torc to meet the second Waverley criterion.

Waverley 3? The Committee agreed unanimously that the torc met the third Waverley criterion. There was a scarcity of knowledge about this type of object, and further research was necessary to learn how it may have been used and by whom. They noted that the torc was unique in its diminutive size, suggesting that it could have been made to be worn around a child's neck, rather than an adult's arm.

Outcome:

The Committee recommended that a decision on the export licence should be deferred for two months to enable an offer to purchase the torc to be made at the agreed fair market price of £45,000 (plus VAT). There would have been a second deferral period of three months if there were a serious expression of interest and the owner granted an Option Agreement.

At the end of the first deferral period, no offer to purchase the torc had been made. An export licence was therefore issued.



CASE 8 A needlework sampler of Menai Bridge, Anglesey by Mary Anne Hughes, age 11

Object: A needlework picture of Thomas Telford's suspension bridge across the Menai Strait, with a steamship and seven other marine craft, and figures walking in the foreground. Made in 1829. Coloured silks on linen. 44 cm x 66 cm.

Export licence application:

The applicant had applied to export the sampler to the USA. The value on the export licence application was £14,564, which represented the hammer price at auction (£11,000) plus the buyer's premium (£3,432) plus overhead premium (£132).

The Curator, Fashion and Textiles 1800-1900 at the V&A objected to the export of the sampler under the first and third Waverley criteria and acted as expert adviser.

The applicant disputed that the sampler met any of the Waverley criteria.

Committee meeting:

The Committee heard this case in September 2024 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Kerry Taylor; Rachel Whitworth; and Isabella Rosne who became temporary members of the Committee for this case.



Case 8 A needlework sampler of Menai Bridge, Anglesey by Mary Anne Hughes, age 11

Waverley 1? By a majority, the Committee agreed that the sampler met the first Waverley criterion. They noted that it was an exceptionally interesting and engaging object, and it was unusual to see the subject Menai Bridge depicted in this format. There are very few known examples of young girls engaging with technology and innovation from this period, and the sampler highlighted an essential aspect of education for women and girls. They noted the importance of folk art and the rarity of this kind of work to survive and be celebrated.

Waverley 2? The Committee did not consider the sampler to meet the second Waverley criterion.

Waverley 3? The Committee agreed that the sampler met the third Waverley criterion. It presented a compelling case for study, particularly within social and local history. Most samplers from this time would typically have depicted text and animals, so the depiction of technology by a young girl indicated the impact of the bridge's construction on the people and community of the area.

Outcome:

The Committee recommended that a decision on the export licence should be deferred for two months to enable an offer to purchase the sampler to be made at the agreed fair market price of £14,564 (inclusive of VAT of £594). There would be a second deferral period of three months if there were a serious expression of interest and the owner granted an Option Agreement.

During the first deferral period, Storiell, Bangor submitted a serious expression of interest to acquire the sampler. The owner accepted the offer and granted Storiell an Option Agreement. The decision on the export licence application was therefore deferred for a further three months.



Case 8 A needlework sampler of Menai Bridge, Anglesey by Mary Anne Hughes, age 11
© Storiell, Cyngor Gwynedd

Storiell, Bangor acquired the sampler for £14,564 with support from Friends of Storiell and Arts Council England/V&A Purchase Grant Fund.

CASES 9 & 10 Two Roman Mosaics

CASE 9 Roman mosaic with geometric pelta pattern



Case 9 Roman mosaic with geometric pelta pattern

Object: A section of mosaic consisting of a purple-brown and red “running peltae” pattern (a crescent-shaped shield design) circa AD 300-50. Discovered at Fullerton villa, Hampshire. 125 cm x 442 cm.

Export licence application:

The applicant had applied to export the pelta mosaic to the USA. The value on the export licence application was £400,000 which represented the retail price.

CASE 10 Roman geometric monochrome mosaics



Case 10 Roman geometric monochrome mosaics

Object: A section of monochrome mosaic made up of a series of purple-brown and white rectangles in two offset rows. It is in combination with another section showing a labyrinth surrounded by a band with large, inward pointing “dentils” (teeth-like blocks) circa AD 300-50. Discovered at Fullerton villa, Hampshire. 272 cm x 190 cm.

Export licence application:

The applicant had applied to export the monochrome mosaics to the USA. The value for the monochrome mosaics was £210,000, which represented the retail price.

The Keeper, Britain, Europe & Prehistory at the British Museum objected to the export of the mosaics under the first and third Waverley criteria and acted as expert adviser.

The applicant did not dispute that the mosaics met any of the Waverley criteria.

Committee meeting:

The Committee heard both Case 9 and Case 10 in June 2024 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Georgiana Aitken; Michael Fulford; and Alex Tweedy who became temporary members of the Committee for these cases.

Waverley 1? The Committee agreed that both mosaics met the first Waverley criterion. They recognised that the mosaics from the Roman villa were unique pieces that contributed significantly to the knowledge of the site and would shed light on the original owner. They noted that the context and history behind the mosaics were key to their national importance.

Waverley 2? The Committee noted that the pelta design (Case 9) was beautiful and interesting in its composition, however most members agreed that it did not meet the second Waverley criterion. The Committee did not consider the monochrome mosaics (Case 10) to meet the second Waverley criterion, although the idea of these sections as part of a labyrinth pattern was interesting.

Waverley 3? The Committee agreed that both the mosaics met the third Waverley criterion due to the huge research potential of the Roman villa as a site and the function of the mosaics within it.

Outcome:

The Committee considered the values on the licences and the comparable items given by the applicant to justify them. They agreed that the values were not well substantiated and recommended that the Secretary of State should commission an independent valuation for both mosaics. The Secretary of State agreed with the Committee's recommendation and instructed Joanna van der Lande.

Case 9 The pelta mosaic was valued at £380,000

Case 10 The monochrome mosaic was valued at £180,000.

The owner agreed to be bound by these values, and the Committee was given sight of the valuations.

The Committee then recommended that a decision on the export licences should be deferred for three months to enable an offer to purchase one or both the mosaics to be made at the agreed fair market prices:

Case 9 £380,000 (plus VAT of £76,000)

Case 10 £180,000 (plus VAT of £36,000)

There would have been a second deferral period of three months if there were a serious expression of interest and the owner granted an Option Agreement.

At the end of the first deferral period, no offer to purchase the mosaics had been made. Export licences were therefore issued.

CASE 11 *Sculpture with Colour (Oval Form) Pale Blue and Red* by Dame Barbara Hepworth

Object: Painted wood and string sculpture.
Carved in 1943. 50.2 cm.

Export licence application:

The applicant had applied to export the sculpture to the USA. The value on the export licence application was £3,652,180.63, which represented the hammer price at auction (£2,900,000) plus the buyer's premium (£649,000), plus artist resale right (£10,680.63), plus commission (£92,500).

The Curator, Exhibitions and Displays at Tate St Ives objected to the export of the sculpture under the second and third Waverley criteria and acted as expert adviser.

The applicant dispute that the sculpture met any of the Waverley criteria.



Committee meeting:

The Committee heard this case in October 2024 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Eleanor Clayton; Jeremy Lewison; and Robert Upstone who became temporary members of the Committee for this case.

Waverley 1? Although the expert adviser had not put forward the first Waverley criterion, the Committee by a majority agreed that it was met because this was a pivotal sculpture from Dame Barbara Hepworth, one of the most important and influential British sculptors. They agreed that the provenance was exceptional and noted the outstanding significance of Hepworth's relationship with Helen Sutherland.

Waverley 2? The Committee agreed that the sculpture was of outstanding aesthetic significance and met the second Waverley criterion as it marked Hepworth's transition from Constructivism to creating stringed and coloured sculptures.

Waverley 3? The Committee agreed that the sculpture met the third Waverley criterion as it was one of only eight produced by Hepworth created during the Second World War. Alongside other sculptures from this series in UK public collections, the Committee noted that it would provide outstanding opportunity for study as well as insight into the evolution of Hepworth's career.

Case 11 *Sculpture with Colour (Oval Form) Pale Blue and Red*
by Dame Barbara Hepworth

Outcome:

The Committee recommended that a decision on the export licence should be deferred for three months to enable an offer to purchase the sculpture to be made at the agreed fair market price of £3,652,180.63 (plus VAT of £129,800). There would be a second deferral period of five months if there were a serious expression of interest and the owner granted an Option Agreement.

During the first deferral period, The Hepworth Wakefield submitted a serious expression of interest to acquire the sculpture. The owner accepted the offer and granted The Hepworth an Option Agreement. The decision on the export licence application was therefore deferred for a further five months.

At the time of the publication of this report, the case was still in its second deferral period, which ends on 27 August 2025.

CASE 12 Relic gems from the Piprahwa stupa, India

Object: A large group of 334 Indian Buddhist relic gems and jewels from the ancient Buddhist stupa at Piprahwa, India, contained in three frames. The gems possibly date to circa 240-200 BCE.

Export licence application:

The applicant had applied to export the gems to Hong Kong. The value on the export licence application was £11,328,551, which represented the sterling equivalent of an estimated value (£9,851,246) plus buyer's premium (£1,477,305).

The Senior Curator, South Asia at the V&A objected to the export of the gems under the second and third Waverley criteria and acted as expert adviser.

The applicant disputed that the gems met any of the Waverley criteria.

Committee meeting:

The Committee heard this case in November 2024 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Runjeet Singh; Jonathan Tucker; and Jack Ogden who became temporary members of the Committee for this case.

Waverley 1? The Committee did not consider the gems to meet the first Waverley criterion.

Waverley 2? The Committee agreed that the gems were beautiful but not aesthetically significant enough to meet the second Waverley criterion.

Waverley 3? The Committee agreed that the gems were interesting but would not necessarily lead to new information through further research.

Outcome:

The Committee recommended that an export licence should be issued and the Secretary of State agreed with the recommendation.

CASE 13 The Fairhaven Panels: A Polyptych with Mars, Virtu Invincibile, Minerva and Magnificence, De Vély

Object: Panels made of hardstone, glass granules, semi-precious and precious stones, and partially enamelled and gilt metal, on a wax and wood core, each mounted within gilt bronze cases. Made circa 1685-1702 by De Vély (dates unknown). Flanking panels: 48 cm x 26 cm; central panels: 48 cm x 23.5 cm.

Export licence application:

The applicant had applied to export the panels to Hong Kong. The value on the export licence application was £1,620,000, which represented the hammer price at auction (£1,350,000) plus the buyer's premium (£270,000).

The Senior Curator, Sculpture at the V&A objected to the export of the panels under the second and third Waverley criteria and acted as expert adviser.

The applicant disputed that the panels met any of the Waverley criteria.

Committee meeting:

The Committee heard this case in November 2024 and considered the expert adviser and the applicant's arguments. They were joined

by three independent assessors: Rufus Bird; Lindsay Macnaughton; and James Rothwell who became temporary members of the Committee for this case.

Waverley 1? By a large majority, the Committee did not consider the panels to meet the first Waverley criterion.

Waverley 2? The Committee agreed that the panels met the second Waverley criterion. They recognised the technical brilliance and the use of materials on display and noted that they were particularly extraordinary when viewed in person.

Waverley 3? The Committee agreed that the panels met the third Waverley criterion. The panels could provide insight into the tastes of the Fairhavens as well as open up further study into this type of object. In particular, one of the panels was signed and dated which would shed light on De Vély, an artist about whom very little is known.

Outcome:

The Committee recommended that a decision on the export licence should be deferred for three months to enable an offer to purchase the panels to be made at the agreed fair market price of £1,620,000 (plus VAT of £54,000). There would have been a second deferral period of four months if there were a serious expression of interest and the owner granted an Option Agreement.

At the end of the first deferral period, no offer to purchase the panels had been made. An export licence was therefore issued.



Case 13 The Fairhaven Panels: A Polyptych with Mars, Virtu Invincibile, Minerva and Magnificence, De Vély

CASE 14 The Sutton Scotney Iron Age Brooch

Object: A copper alloy harness brooch, also known as a horse brooch or pony brooch, dating from the Late Iron Age in southern Britain. 68.9mm x 8.3mm x 55.2mm.

Export licence application:

The applicant had applied to export the brooch to the USA. The value on the export licence application was £18,500, which represented an agreed sale price.

The Keeper, Britain, Europe & Prehistory at the British Museum objected to the export of the brooch under the first, second, and third Waverley criteria and acted as expert adviser.

The applicant did not dispute that the brooch met any of the Waverley criteria.

Committee meeting:

The Committee heard this case in November 2024 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Georgiana Aitken; Jody Joy; and Melanie Giles who became temporary members of the Committee for this case.

Waverley 1? The Committee agreed that the brooch met the first Waverley criterion as it provided insight into the strong connection between charioteers, their chariots and ponies. Furthermore, the recorded find-spot of the brooch was incredibly significant, and the Committee noted that the brooch would provide further information about the local and regional history of Sutton Scotney and Hampshire.

Waverley 2? The Committee agreed that the brooch met the second Waverley criterion due to the cleverness of its design and the interplay between Celtic motif and asymmetry.



Case 14 The Sutton Scotney Iron Age Brooch.
Photo courtesy of ArtAncient

Waverley 3? The Committee agreed that the brooch met the third Waverley criterion and that it would provide significant understanding into the use of textiles and metalwork and how Iron Age people adorned their chariots.

Outcome:

The Committee recommended that a decision on the export licence should be deferred for two months to enable an offer to purchase the brooch to be made at the agreed fair market price of £18,500 (plus VAT of £3,700). There would be a second deferral period of three months if there were a serious expression of interest and the owner granted an Option Agreement.

During the first deferral period, Hampshire Cultural Trust submitted a serious expression of interest to acquire the brooch. The owner accepted the offer and granted Hampshire Cultural Trust an Option Agreement. The decision on the export licence application was therefore deferred for a further three months.

Costas Paraskevaides and Jethro Sverdlhoff, on behalf of ArtAncient Ltd, donated the brooch to Hampshire Cultural Trust for the museum collections owned by Hampshire County Council.

CASE 15 Early Anglo Saxon Gold and Garnet Cloisonné Panel, trapezoidal form

Object: A trapezoidal panel dating from the early to mid-7th century, made from gold inlaid with garnets in the cloisonné technique. 21.3mm x 7.3mm expanding to 14.9mm.

Export licence application:

The applicant had applied to export the panel to Latvia. The value on the export licence application was £3,968, which represented the hammer price at auction (£3,200) plus the buyer's premium (£640), plus VAT (£128).

The Keeper, Britain, Europe & Prehistory at the British Museum objected to the export of the panel under the third Waverley criterion and acted as expert adviser.

The applicant disputed that the panel met any of the Waverley criteria.

Committee meeting:

The Committee heard this case in December 2024 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Leslie Webster;

Georgiana Aitken; and Chris Scull who became temporary members of the Committee for this case.

Waverley 1? The Committee agreed that the panel met the first Waverley criterion because it was rooted in our national story, from a significant period of our history when kingdoms were merging to become modern England. The find-spot in the North of England was particularly interesting as a site of cultural exchange and gave the panel considerable regional significance.

Waverley 2? The Committee did not consider the panel to meet the second Waverley criterion.

Waverley 3? The Committee agreed that the panel met the third Waverley criterion due to the numerous research opportunities it presented. There was a lot to learn about the origins of the materials, particularly the garnets, and the object's function as a whole. The panel was invaluable for learning about the social and political structures in this part of the country at the time.

Outcome:

The Committee recommended that a decision on the export licence should be deferred for two months to enable an offer to purchase the panel to be made at the agreed fair market price of £3,968 (inclusive of VAT of £128). There would be a second deferral period of three months if there were a serious expression of interest and the owner granted an Option Agreement.



Case 15 Early Anglo Saxon Gold and Garnet Cloisonné Panel, trapezoidal form

During the first deferral period Arts Council England received two serious expressions of interest to acquire the panel. The owner accepted the offer from Pocklington District Heritage Trust and granted them an Option Agreement. The decision on the export licence application was therefore deferred for a further three months.

Pocklington District Heritage Trust acquired the panel for £3,968 with support from public fundraising. Pocklington will work in partnership with East Riding of Yorkshire Council's Museum Service which will provide public access to the panel while Pocklington secures its own premises to display it.

CASE 16 *An Indian Encampment with Elephants* by Johann Zoffany

Object: *An Indian Encampment with Elephants*, c.1783–9. Oil on canvas, 740 x 1130 x 90 mm.

Export licence application:

The applicant had applied to export the painting to the USA. The value on the export licence application was £2,400,000, which represented an estimated value.

The Curator, British Art c.1730-1850 at Tate Britain objected to the export of the painting under the second and third Waverley criteria and acted as expert adviser.

The applicant disputed that the painting met any of the Waverley criteria.

Committee meeting:

The Committee heard this case in February 2025 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Brian Allen; David Solkin; and Anthony Mould who became temporary members of the Committee for this case.

Waverley 1? The Committee did not consider the painting to meet the first Waverley criterion.

Waverley 2? The Committee agreed that the painting was interesting but not of outstanding aesthetic importance and therefore did not meet the second Waverley criterion.

Waverley 3? The Committee by a majority agreed that the painting did not meet the third Waverley criterion as the research opportunities it presented were limited.

Outcome:

The Committee recommended that an export licence should be issued and the Secretary of State agreed with the recommendation.

CASE 17 *Sir William Young Conducting a Treaty with the Black Caribs on the Island of St Vincent, 1773* by Agostino Brunias

Object: A painting by Agostino Brunias (c.1730-1796). Recent research has argued that the subject may be General Dalrymple instead of Sir William Young. Oil on canvas. 56 cm x 61 cm.

Export licence application:

The applicant had applied to export the painting to the Netherlands. The value on the export licence application was £240,000 which represented the hammer price at auction (£200,000) plus the buyer's premium (£40,000).

The Senior Curator, Art and Identity at the Royal Museums Greenwich objected to the export of the painting under the first and third Waverley criteria and acted as expert adviser.

The applicant disputed that the paintings met any of the Waverley criteria.

Committee meeting:

The Committee heard this case in January 2025 and considered the expert adviser and the applicant's arguments. They were joined

by three independent assessors: Martin Postle; Matthew J Smith; and Lowell Libson who became temporary members of the Committee for this case.

Waverley 1? The Committee unanimously agreed that the painting met the first Waverley criterion as it was of significant historical importance for the period of British colonialism and expansion. It was rare to have a contemporary visual record of an historical event, and this was the only known depiction of a treaty being conducted in the Caribbean.

Waverley 2? The Committee did not consider the painting to meet the second Waverley criterion.

Waverley 3? The Committee agreed that the painting met the third Waverley criterion, particularly when considering the increased academic and artistic interest in depictions of British colonialism in the Caribbean.

Outcome:

The Committee recommended that a decision on the export licence should be deferred for three months to enable an offer to purchase the painting to be made at the agreed fair market price of £240,000 (plus VAT of £8,000). There would be a second deferral period of three months if there were a serious expression of interest and the owner granted an Option Agreement.

At the end of the first deferral period, no offer to purchase the painting had been made. An export licence was therefore issued.



Case 17 *Sir William Young Conducting a Treaty with the Black Caribs on the Island of St Vincent, 1773* by Agostino Brunias

CASE 18 *A family of Charaibes in the Island of St Vincent* by Agostino Brunias

Object: A painting by Agostino Brunias (c.1730-1796). Oil on canvas. 56 cm x 61 cm.

Export licence application:

The applicant had applied to export the painting to the Netherlands. The value on the export licence application was £180,000 which represented the hammer price at auction (£150,000) plus the buyer's premium (£30,000).

The Senior Curator, Art and Identity at the Royal Museums Greenwich objected to the export of the painting under the third Waverley criterion and acted as expert adviser.

The applicant disputed that the painting met any of the Waverley criteria.

Committee meeting:

The Committee heard this case in January 2025 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Martin Postle; Matthew J Smith; and Lowell Libson who became temporary members of the Committee for this case.



Case 18 *A family of Charaibes in the Island of St Vincent* by Agostino Brunias

Waverley 1? By a majority, the Committee agreed that the painting did not meet the first Waverley criterion, though it was of historical importance for the period of British colonialism and expansion.

Waverley 2? The Committee did not consider the painting to meet the second Waverley criterion.

Waverley 3? The Committee agreed that the painting met the third Waverley criterion, as this was the most comprehensive genre painting produced by Brunias of Indigenous people. The painting presented outstanding potential for further study, particularly around the European constructs of race in the 18th century.

Outcome:

The Committee recommended that a decision on the export licence should be deferred for three months to enable an offer to purchase the painting to be made at the agreed fair market price of £180,000 (plus VAT of £6,000). There would be a second deferral period of three months if there were a serious expression of interest and the owner granted an Option Agreement.

At the end of the first deferral period, no offer to purchase the painting had been made. An export licence was therefore issued.

CASE 19 *The Virgin and Child enthroned* by Alessandro di Mariano Filipepi, called Sandro Botticelli

Object: A painting of The Virgin and Child enthroned, painted in the early 1470s by Botticelli (1445-1510). Tempera on panel. 83.3 cm x 44.9 cm.

Export licence application:

The applicant had applied to export the painting to the USA. The value on the export licence application was £10,819,050, which represented the hammer price at auction (£8,600,000) plus the buyer's premium (£1,360,000) plus USA state sales tax (£859,050). USA state sales tax would not be payable in the event of a UK sale.

The Director at the National Gallery objected to the export of the painting under the second and third Waverley criteria and acted as expert adviser.



Case 19 *The Virgin and Child enthroned* by Alessandro di Mariano Filipepi, called Sandro Botticelli

The applicant disputed that the painting met any of the Waverley criteria.

Committee meeting:

The Committee heard this case in March 2025 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Tim Hunter; Catherine Whistler; and Alison Wright who became temporary members of the Committee for this case.

Waverley 1? The Committee did not consider the painting to meet the first Waverley criterion.

Waverley 2? The majority of the Committee did not consider the painting to meet the second Waverley criterion, although they agreed that there were interesting and powerful design elements.

Waverley 3? The Committee agreed that the painting met the third Waverley criterion, particularly for the outstanding opportunity it provided to study Botticelli and his workshop practices. They noted that the level of workshop involvement in the picture was still unknown and did not detract from the painting's importance as a Botticelli.

Outcome:

The Committee recommended that a decision on the export licence should be deferred for three months to enable an offer to purchase the painting to be made at the agreed fair market price of £9,960,000 (plus VAT of £272,000). There would be a second deferral period of six months if there were a serious expression of interest and the owner granted an Option Agreement.

At the time of the publication of this report, the painting was still in its first deferral period, which ends on 8 August 2025.

CASE 20 *Cimon Falling in love with Efigenia*, Peter Paul Rubens

Object: A preparatory study painting, or *modello*, c. 1616–17, for *Cimon Falling in love with Efigenia*, a monumental painting by Rubens (1577-1640) in the Kunsthistorisches Museum in Vienna. Oil on panel. 29.8 x 43.5 cm.

Export licence application:

The applicant had applied to export the painting to the USA. The value on the export licence application was £8,000,000, which represented a private sale price. £440,000 agent's commission was also paid and would be included in the recommended value.

The Director at the National Gallery objected to the export of the painting under the second and third Waverley criteria and acted as expert adviser.

The applicant disputed that the painting met any of the Waverley criteria.

Committee meeting:

The Committee heard this case in April 2025 and considered the expert adviser and the applicant's arguments. They were joined by three independent assessors: Desmond Shawe-Taylor; Anthony Speelman; and Lucy Whitaker who became temporary members of the Committee for this case.



Waverley 1? The Committee did not consider the painting to meet the first Waverley criterion.

Waverley 2? The Committee agreed that the painting met the second Waverley criterion and was immensely powerful, particularly as it was in Rubens' own hand and therefore displayed his skill fully. Its completeness as a *modello* highlighted the transformation from the originally conceived idea to the final workshop painting in Vienna.

Waverley 3? The Committee agreed that the painting met the third Waverley criterion. They acknowledged that the voyeuristic theme toward the subject of the female nude was somewhat disturbing but would be of outstanding interest and relevance to a modern audience.

Outcome:

The Committee recommended that a decision on the export licence should be deferred for three months to enable an offer to purchase the painting to be made at the agreed fair market price of £8,440,000. There would be a second deferral period of six months if there were a serious expression of interest and the owner granted an Option Agreement.

At the time of the publication of this report, the painting was still in its first deferral period, which ends on 15 September 2025.

Case studies and impact

The work of the Reviewing Committee continues to play a key role in saving national treasures for the public to enjoy in communities across the UK. In last year's annual report, the Committee highlighted some examples of objects and their impact on the institutions that had successfully acquired them.

This year, two paintings are the focus of the Committee's case studies: *A Young Teacher* by Rebecca Solomon and *Two Women Wearing Cosmetic Patches*. Both paintings have been the subject of fascinating academic research, as well as extremely positive public reception.

***A Young Teacher*, by Rebecca Solomon (RCEWA Case 8, 2022-23)**

A Young Teacher was painted in 1861 by Rebecca Solomon (1832–1886). It depicts the Pre-Raphaelite model Jamaican-born Fanny Eaton as well as two currently unidentified English children.

A Young Teacher was acquired jointly by Tate and Museum of the Home in February 2023 with support from the Nicholas Themans Trust, Art Fund, the Abbott Fund, and the National Lottery Heritage Fund. This exciting purchase set a precedent for future potential joint ownership.

The painting was first displayed in Tate Britain's Pre-Raphaelite gallery alongside paintings by Rebecca Solomon's brother, Simeon, as well as her other male counterparts. It was also featured in Tate's *Now You See Us* exhibition which highlighted the works of women artists from 1520-1920.

The painting moved to the Museum of the Home in Autumn of 2024 where it is currently displayed in the 1878 Townhouse room of their *Rooms Through Time* gallery which tells the story of Indian ayahs living in London.

The painting has already provoked insightful and interesting research, demonstrating its outstanding significance for study that the Reviewing Committee noted when it saw the painting in 2022. The painting inspired the museum's *Reframing Home* symposium in November 2024, a conference attended by 45 people which explored the issues of gender, race, domestic labour, class and faith within the piece. In March 2025, the museum also hosted late-night access to the gallery as part of their *Housewarming* series, which allowed visitors to learn about the history of South Asian domestic workers. The event had over 200 attendees.

A spokesperson from the Museum of the Home offered the following insight into the importance of this painting for their collection:

"*A Young Teacher* has already galvanised action and research, providing the inspiration behind the *Reframing Home* symposium, and challenging the Museum to continue to collect stories and objects that represent the long and integral history of South Asian communities in Britain. Its influence and meaning will continue to grow and evolve as it is sent on loan throughout the world, and moved between the Museum of the Home and Tate every few years to help future curators unlock new ways of exploring the multifarious layers of Solomon's fascinating work."



A Young Teacher by Rebecca Solomon, on display in the Victorian Townhouse room at the Museum of the Home © The Museum of the Home



A Young Teacher by Rebecca Solomon, on display in the Victorian Townhouse room at the Museum of the Home © Museum of the Home



The *Housewarming* Event at the Museum of the Home © Museum of the Home

Two Women Wearing Cosmetic Patches **RCEWA Case 8 (2021-22)**

Two Women Wearing Cosmetic Patches was painted by an unknown artist around 1655. It depicts a Black woman and a white woman side by side. The inscription reads: 'I black with white bespott: yu white wth blacke this Evill: proceeds from thy proud hart: then take her: Devill:'

Two Women Wearing Cosmetic Patches was acquired by Compton Verney in 2023 with support from the National Heritage Memorial Fund and the Arts Council England/ V&A Purchase Grant Fund. Compton Verney is extremely grateful to be able to display this fascinating painting, which depicts a Black woman and a white woman, and provides insight into 17th century society and visual culture.

The painting was initially loaned to the Yale Centre for British Art (YCBA), Connecticut for restoration and study. It was the subject of a symposium *A Puritan Picture: Vanity, Morality, and Race in Seventeenth-Century Britain* held at Yale University in September 2024, which highlighted the research on its meaning and attribution that had already been undertaken at Yale.

In November 2024, the painting was displayed in the Women's Library at Compton Verney, alongside a [short film made by the YCBA](#) detailing their research. Alongside the painting in the Library are two books from the same period which add context to the painting: *Anthrometamorphosis: the man transform'd or, the artificiall changeling* (1653) and *A discourse upon some innovations of habits and dressings against powdring of hair, Naked-Breasts, Black Spots and other unseemly Customes* (1653). The display explores 17th-century morality and its connection with race and gender and will inspire further research into the painting and its legacy.

Academics and visitors alike have been drawn to this painting and will continue to be as it remains on display. In 2021, the Reviewing Committee agreed that the painting was of outstanding significance to the study of race and gender in the 17th century, which has been demonstrated exceptionally since its acquisition. In addition, it has had a strong positive response from the public, with comments from visitors such as:

"It is fantastic that Compton Verney acquired this painting. It depicts a really interesting aspect of history that I had not heard of before."



Two Women Wearing Cosmetic Patches on display in the Women's Library at Compton Verney
© Compton Verney



Two Women Wearing Cosmetic Patches
© Compton Verney

