



Applying New Solutions for Cultural Heritage protection by
Innovative, Scientific, social and economic Engagement

Training Programme models

Art Market

*The Illicit Trade in Cultural Property:
Risks, Due Diligence,
and Professional Procedures*



Funded by
the European Union

Summary

1. Module identification and context.....	3
1.1 Specific justification.....	3
1.2 Target audience definition.....	4
2. Format and Audience Breakdown.....	6
2.1 One-day format (6 hours).....	6
2.2 One-week format (30 hours).....	8
2.3 Winter/Summer Session (2 intensive weeks).....	10
3. Practical implementation.....	13
3.1 Instructor requirements.....	13
3.2 Logistical requirements.....	14
3.3 Quality assurance.....	14
4. Contextual adaptations.....	15
4.1 Local/national variations.....	15
4.2 International standardization.....	16
4.3 Cross-disciplinary adaptation and transferability.....	16

1 Module identification and context

- **Module name:** The Illicit Trade in Cultural Property: Risks, Due Diligence, and Professional Procedures
- **Target community:** Art market professionals (auction houses, auctioneers, experts, antique dealers, gallerists, dealers, collectors)
- **Responsible partner:** University of Poitiers

1.1 Specific justification

Particular challenges:

- High vulnerability of the market: documentary opacity, fragmented transactions, cross-border circulation, lack of strict obligations for some actors (gallerists, brokers, private sales...)
- Documented increase in risks related to money-laundering vulnerabilities: falsified provenance, fraudulent restorations, misleading re-cataloguing, layering of sales, fake certificates...
- Major legal risks: seizures, criminal liability, customs sanctions, reputational risk for auction houses and gallerists, and need for a reminder of legal obligations.

Current training gaps:

- Absence of a unified training course on due diligence specifically designed for art-market professionals. There is no legal requirement for initial or continuing training for experts or antique dealers, as these professions are self-regulated, whereas auctioneers have been required since 2022, under Decree No. 2023-119 of 20 February 2023 (Article R321-31-1 of the Commercial Code), to complete a minimum of 20 hours of training per year.
- Limited knowledge of recent legal obligations (AML/CFT, export rules, mandatory registers, Heritage Code).
- Lack of practical training: identifying red flags, document analysis, provenance research, interrogation of international databases.

Professional needs:

- Clear operational framework to assess the legality of an object (checklists, protocols).
- Skills update for experienced professionals not trained in recent regulations.
- Development of visual expertise: identifying documentary inconsistencies, suspicious restorations, alterations.
- Understanding the legal and financial consequences of non-compliance.

Added value:

- Module fully tailored to the realities of the art market (not a generic cultural-heritage course).
- Balanced approach: law, professional practices, visual analysis, internal protocols.
- Strong practical component (real cases, visual exercises, simulations).
- Production of reusable documents (checklists, reporting templates, internal procedures).

1.2 Target audience definition

Student prerequisites:

- Basic knowledge of the art market (BA/MA level).
- General familiarity with market practices (pricing, public sale, expertise).

Professional prerequisites:

- No mandatory prerequisites.
- Mixed profile:
 - Young professionals (trainee auctioneers, gallery assistants, new dealers),
 - Active professionals wishing to update their regulatory knowledge.

Recommended group size:

- 1-day format: 15–25 participants
- 1-week format: 12–18 participants (for workshops and case studies)
- Winter/Summer Session (2 intensive weeks) : 12-18 participants

Unlike the modules designed for the other communities, the one intended for art-market professionals must take into account the particular constraints of this sector—most notably the issue of limited availability, which emerged repeatedly during the interviews we conducted. For this reason, the art-market module does not include any semester-long training format, as such a structure would not reflect the reality of the sector; professionals and students alike simply would not be able to attend it.

To clarify why a semester-long training programme would not be feasible for professionals or students in the art market, the following points summarise the main constraints identified through analysis and stakeholder interviews:

- Severely limited availability of art-market professionals

Their schedules involve constant travel and irregular work patterns linked to fairs, auctions, and exhibitions, making it unrealistic to commit to a long, regular semester-based format.

- Consistent feedback from stakeholders

Interviews with professionals, students, and market actors all converge on the same conclusion: long-term training programmes are incompatible with their professional and academic obligations.

- Existing academic programmes leave no room for long additional training

Current art-market-related curricula already allocate very limited time to cultural property protection; their time is mostly dedicated to thesis writing and internships, leaving virtually no flexibility for semester-long external courses.

- Comparable long-format programmes do not cover these topics

Even the few semester-based options available do not offer advanced modules on cultural property protection or illicit trafficking. This suggests that long, specialised formats are not aligned with sector norms or needs.

- Availability concentrated in specific “downtime” periods

The only periods when the target audience has meaningful availability are during the summer and early January, when the art market pauses. This supports the relevance of short, intensive formats such as summer/winter sessions rather than semester-long programmes.

2 Format and audience breakdown

- **Students/Academics**
- **Professionals**

2.1 One-day format (6 hours)

Students/Academics:

Learning objectives:

- Identify the main vulnerabilities of the art market regarding illicit trafficking.
- Detect documentary, material, and transactional red flags.
- Apply a due-diligence checklist to a real transaction.
- Explain French and international legal obligations (export, AML/CFT, registers).

Content structure:

- **Session 1 (1.5h): Vulnerabilities and Typologies of Offences**
 - Market opacity, cross-border circulation.
 - Money-laundering strategies (15 typologies).
 - Documentary indicators (vague provenance, contradictions).
 - Material indicators (removed marks, added elements).
 - Visual examples: altered objects, suspicious restorations, forged documents.
- **Session 2 (1.5h): Provenance Research Techniques (possible link with MUS module and EDL provenance)**
 - Fundamentals (provenance chain, chronology, gaps).
 - Archival, bibliographic, material/technical, digital, legal, and art-market methods.
 - Contextual analysis (historical events, dispersal of collections, intermediary actors).
 - Building a provenance report (writing, chronology, sources, gaps).
 - Limits (missing archives, incomplete chain of ownership, contradictory information).
- **Session 3 (1.5h): Due Diligence and Legal Obligations**
 - Complete checklist: seller identity, ownership chain, technical documents.
 - Police ledger, property register, contractual clauses.
 - Export/certificates; AML/CFT; official declarations.
- **Session 4 (1.5h): What to Do in Case of Doubt?**
 - Immediate protocol (6 steps).
 - Whom to contact: police, customs, ministries, databases.
 - Case studies: simulated reporting procedure.

Teaching methods:

- Visual examples (photos of fraudulent objects).
- Documentary analysis workshops.
- Interactive presentation + discussion.
- Case studies

Required materials:

- Projector, screens or tablets for visual cases.
- PDF kit containing: checklist, templates, database list.

Assessment method:

- Short MCQ + analysis of a visual case.

Expected outcomes:

- Ability to identify risks and apply basic checks.
- Clear understanding of legal responsibilities.

Professionals:

Learning objectives:

- Implement a due-diligence procedure compliant with legal obligations.
- Identify high-risk situations (document fraud, deceptive restoration).
- Use key databases effectively (Interpol, ICOM Red Lists, Rose-Valland, ALR).
- React appropriately when encountering a stolen or looted object.

Content structure:

- Session 1 – Market risks & vulnerabilities
- Session 2 – Red flags and analysis of real objects
- Session 3 – Due diligence and legal obligations
- Session 4 – Protocols for suspect objects + real cases

(Equivalent to student format but more operational.)

Teaching methods:

- Case studies based on real anonymised files.
- Documentary-verification workshop.
- Deconstruction of false provenances.

Required materials:

- Anonymised real case files.
- Access to major databases (demonstrations).

Assessment method:

- Evaluation of a short due-diligence file.

Certification/recognition:

- Certificate of competence: "Due Diligence & Combating Illicit Trafficking – Art Market."

2.2 One-week format (30 hours)

Students/Academics:

Learning objectives:

- Understand market vulnerabilities and fraud strategies.
- Apply full due diligence to a “complex” case.
- Analyse an object (photos, documents) to detect anomalies and risks.
- Master legal, administrative, and customs obligations.
- Build a provenance dossier.
- Develop an internal compliance procedure.

Daily programme structure:

- Day 1: Understanding Illicit Trafficking
 - Vulnerabilities, typologies (documentary, material, transactional fraud).
 - Guided visual analysis. Methods: lecture, photo workshop.
- Day 2: Legal Obligations and Responsibilities
 - Export rules, certificates.
 - AML/CFT: obligations for art dealers.
 - Risk-classification exercises.
- Day 3: Red Flags and Camouflage Strategies
 - 15 concealment strategies (detailed cases).
 - Workshop: comparing regular vs suspicious objects.
- Day 4: Full Due Diligence
 - Detailed checklist (documentary, material, administrative checks).
 - Property register, legal obligations.
 - Workshop: construct a coherent provenance chain. (possible link with MUS module + EDL on provenance)
- Day 5: Responding to a Suspect Object
 - Six-step protocol.
 - Simulation: complete case file → analysis → decision → report.
 - Group presentations.

Theory-practice balance:

- 40% theory / 60% practice (workshops, visual analyses, real cases).

Individual/group work:

- Individual provenance dossier.
- Collective analysis of a real case on Day 5.

Assessment components:

- Continuous assessment (40%): weekly exercises and tests.
- Final evaluation (40%): full due-diligence dossier.
- Participation (20%).

Required deliverables:

- Full due-diligence file (provenance, analyses, checks, risks, recommendations).

Professionals (3 to 4 days maximum)

- Can be offered as part of a summer or winter session when the market is inactive (July–August–early January).

Learning objectives:

- Conduct full, legally robust due diligence.
- Detect material and documentary inconsistencies.
- Master professional and administrative obligations.
- Manage a suspect object in accordance with best practices.
- Draft or review an internal compliance procedure.
- Adopt a methodology / protocol for provenance research

Modular programme structure:

- Module 1 – Market vulnerabilities
- Module 2 – Red flags and visual analysis
- Module 3 – Advanced due diligence
- Module 4 – Legal obligations & AML/CFT
- Module 5 – Professional protocols & wrap-up.

Professional case studies:

- 4–6 detailed cases involving:
- 5 real cases (layered sales, fake certificates, physical alterations).

Peer learning components:

- Cross-presentations of cases in sub-groups.

Assessment for professionals:

- Practical evaluation:
 - Object analysis + justified decision.
- Professional portfolio:
 - Due-diligence dossier (usable in real practice).
- Peer feedback:
 - Structured exchanges.

Follow-up mechanisms:

- Access to documentary kit (checklists, templates).
- Optional follow-up session after 3 months.

2.3 Winter/Summer Session (2 intensive weeks)

“Understanding, Detecting and Preventing the Illicit Trafficking of Cultural Property”
Students & early-career professionals + established art-market actors needing upskilling

Weekly structure:

- 10 days — 60 hours (6h/day)

Programme overview:

- Block 1 — Understanding Illicit Trafficking and Market Vulnerabilities (Days 1–2)
- Block 2 — Red Flags and Risk Identification (Days 3–4)
- Block 3 — Provenance Research and Due Diligence (Days 5–7)
- Block 4 — Legal Essentials and Operational Response (Days 8–10)

Session breakdown:

- BLOCK 1 — UNDERSTANDING ILLICIT TRAFFICKING & MARKET CONTEXT
 - Day 1 — Introduction, Global Context & Typology of Trafficking
 - Global overview of the illicit trade in cultural property
 - Why the art market is vulnerable
 - Economic, legal, and reputational consequences
 - Types of illicit activities (theft, looting, forgery, unlawful export)
 - Workshop: Analysis of real-world cases (visual-based)
 - Day 2 — How the Art Market Functions & Where Risks Arise
 - The value chain of the art market (dealers, galleries, auction houses, experts, brokers)
 - Formal and informal market structures
 - Private sales, silent sales, anonymity issues, intermediaries' risks
 - Workshop: Reconstructing a suspicious transaction chain

- BLOCK 2 — IDENTIFYING RISKS: VISUAL & DOCUMENTARY RED FLAGS
- Day 3 — Object-Based Red Flags: Physical, Stylistic & Material Indicators
 - Traces of looting, tool marks, artificially altered patinas
 - Inconsistent materials or stylistic anomalies
 - Hands-on visual lab: example of suspicious objects to diagnose
 - Introduction to professional visual reasoning
- Day 4 — Documentary Red Flags: Suspicious Provenances & Fake Papers
 - Fake certificates, forged invoices, invented family histories
 - How to interrogate a chain of ownership
 - Workshop: “Authentic or fake?”

- BLOCK 3 — PROVENANCE RESEARCH & DUE DILIGENCE
- Day 5 — Introduction to Provenance Research: Concepts & Foundations
 - What provenance is (and is not)
 - Provenance vs historical narrative vs pedigree
 - Why provenance is key to detecting illicit trade
 - Primary vs secondary sources
 - Workshop: Dissecting real provenance examples
- Day 6 — Professional Methodology: Sources, Tools & Systems
 - How to critically analyse provenance claims
 - Research in public/private archives
 - Museum records, auction archives, reasoned catalogues
 - Digital tools & databases
 - Guided practical exercise: tracing provenance
- Day 7 — Provenance Method + Case Study
 - Presentation of a complete, ready-to-use method (for dealers, Auction Houses, experts):
 - Initial information collection
 - Document analysis
 - Verification of ownership claims
 - Chronological & geographical consistency checks
 - Systematic database screening
 - Archive research
 - Identification of inconsistencies
 - Final decision & documentation
 - Full practical workshop:
 - One complete case file
 - Participants produce a written due-diligence sheet
 - Collective discussion on risk-based decision-making

- BLOCK 4 — LEGAL ESSENTIALS & OPERATIONAL RESPONSE
(Condensed, focused on new elements and practical obligations)
- Day 8 — Legal Essentials (Condensed & Practice-Oriented)
Key principles of National & EU heritage law (focus on essentials only)
Import/export rules: what changed with new EU regulations
KYC / AML requirements in the art market
Workshop: Does this case pass compliance?
- Day 9 — Internal Procedures & Managing a Suspicious Object
Internal reporting structures
Police book / registers / mandatory record-keeping
Reasonable reactions when facing a potentially illicit object
Simulation: A suspicious object arrives for sale the next morning
- Day 10 — Final Practical Evaluation & Synthesis
Grand practical exam:
3 objects
3 provenance files
3 legal issues
Teamwork + oral presentation
Summary of operational tools
Certificate of completion (optional)

3 Practical implementation

3.1 Instructor requirements

Required expertise:

- Strong knowledge of the historical and contemporary art market, including commercial practices.
- Expertise in combating the illicit trade in cultural property.
- Command of legal, regulatory, and ethical obligations (resale, export, AML/CFT, due diligence).
- Skills in visual object analysis (photos, stylistic inconsistencies, suspicious restorations).
- Experience in the art market (auction houses, galleries).
- Proficiency in provenance research.

Training for instructors:

- Prior briefing on learning objectives, pedagogical approach, and visual examples used.
- Familiarisation with simulated documents (certificates, provenances, registers).
- Possible internal training on:
 - Presenting visual red flags.
 - Updated legal frameworks.
 - Online resources used in workshops.

Guest speakers:

- Auctioneers or specialised dealers (practical experience).
- Lawyers specialised in heritage law or AML/CFT compliance.
- Provenance researchers or documentation specialists from heritage institutions.
- Customs officers / control agents (non-operational, pedagogical intervention).

Instructor-participant ratio:

- 1-day format: 1 instructor for 15–20 participants.
- 1-week format: 1 lead instructor + 1 assistant for 12–15 participants (especially during workshops).

3.2 Logistical requirements

Physical space:

- Room with high-resolution projector (essential for visual analysis).
- Modular tables allowing small-group work.
- Boards or tables for displaying/handling printed documents.

Technical requirements:

- Stable internet connection (database consultation).
- Computer for each group or participant (depending on workshop).
- Software: PDF reader, Web browser, Tools for HD image viewing/zooming.

Documentation:

- Printed teaching materials: red-flag sheets, due-diligence checklists, legal-obligation summary tables.
- Case studies in print or digital format.
- Bibliography and online resources provided in PDF.

Budget considerations:

- Remuneration of instructors and speakers.
- Colour printing (essential for visual analysis).
- Possible rights/licences for use of object images.
- Room / IT equipment rental (if not provided by institution).
- Travel expenses for instructors.

3.3 Quality assurance

Module evaluation by participants:

- Anonymous end-of-training questionnaire (content, clarity, usefulness, pace, professional relevance).
- Quick oral feedback at end of session.
- Optional: questionnaire 1–3 months later on real-life use of competencies.

Learning outcome measurement:

- 1-day format: MCQ + small visual analysis.
- 1-week format: corrected practical exercises, final due-diligence dossier, oral presentation.

Continuous improvement process:

- Annual analysis of evaluations.
- Regular updates: new case law, regulatory developments, revised case studies.
- Content adjustments based on feedback from trained professionals.

External validation:

- Institutional partners (École du Louvre, ICOM, etc.)
- Professional associations (auctioneers' unions, dealers' associations)
- Alignment with international networks and initiatives (ICOM, UNESCO, INTERPOL, public-policy guidelines).

4 Contextual adaptations

4.1 Local / national variations

Legislative differences:

- The module must be adapted to:
 - National import/export legislation on cultural property;
 - Property regimes (inalienability, national treasures);
 - National AML/CFT requirements (Tracfin / local FIUs);
 - Professional rules specific to national auction houses.

Institutional variations:

- Differences between highly regulated markets (France, Germany) and more liberal ones (Switzerland, UK).
- Variations in roles/responsibilities: judicial auctioneer vs private auctioneer.
- Specificities of independent galleries depending on country (e.g., fewer obligations outside the EU).

Cultural considerations:

- Different perceptions of the dealer's role (broker, expert, intermediary).
- Varied sensitivities around restitution, colonialism, sensitive provenance.
- Different degrees of State involvement in public sales.

Language adaptations:

- Need to adapt terminology:
 - Provenance vs due diligence vs provenance research,
 - Red flags vs weak signals,
 - Differing legal terms across countries.
- Translation of practical documents and case studies.

4.2 International standardization

Core universal elements:

- Fundamental principles of due diligence.
- Identification of red flags.
- Structure of a credible provenance chain.
- Importance of transparency and traceability.

European best practices:

- EU regulations (exports, imports, AML/CFT).
- European initiatives against illicit trafficking.
- Key role of registers, mandatory documentation, and record-keeping.

International cooperation aspects:

- Use of international databases and standards (INTERPOL, ICOM Red Lists, Object-ID).
- Importance of cross-border tools for contemporary-art transactions.
- Knowledge of international conventions (UNESCO 1970, UNIDROIT 1995).

Transferability guidelines:

- Adapt examples to local market realities (auction houses, galleries, online platforms).
- Adjust legal depth depending on country (EU vs non-EU).
- Maintain the shared foundation: risks, obligations, red flags, verification methods.

4.3 Cross-disciplinary adaptation and transferability

Target disciplines for adaptation:

- Curators / museums (institutional acquisitions).
- Archaeologists (discovery context and field trafficking).
- Cultural-heritage law-enforcement units (investigation and documentation).

Key modifications required:

- For museums: deeper focus on acquisition policies and restitution.
- For archaeologists: more scientific contextualisation and archaeometry bases.
- For law enforcement: stronger focus on evidence, documentation, chain of custody.

Universal transferable elements:

- Fundamentals of provenance.
- Risk and red-flag analysis.
- Importance of complete documentation.
- Professional ethics and transparency.

Interdisciplinary collaboration opportunities:

- Workshops combining researchers, dealers, and cultural institutions.
- Simulations mixing scientific expertise + market constraints + legal obligations.
- Cross-sector documentation projects.

Customization guidelines:

- Retain the three-pillar structure: risks → checks → obligations.
- Adapt case studies to the professional environment.
- Maintain a shared minimum core to ensure transferability.

Resource sharing potential:

- Red-flag sheets usable by museums, archaeologists, and the art market.
- Case studies adaptable to levels of expertise.
- Templates for internal protocols usable by multiple institutions.



Discover more about the ANCHISE project on our website: <https://www.anchise.eu/>



Funded by
the European Union

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union. Neither the European Union nor the granting authority can be held responsible for them.