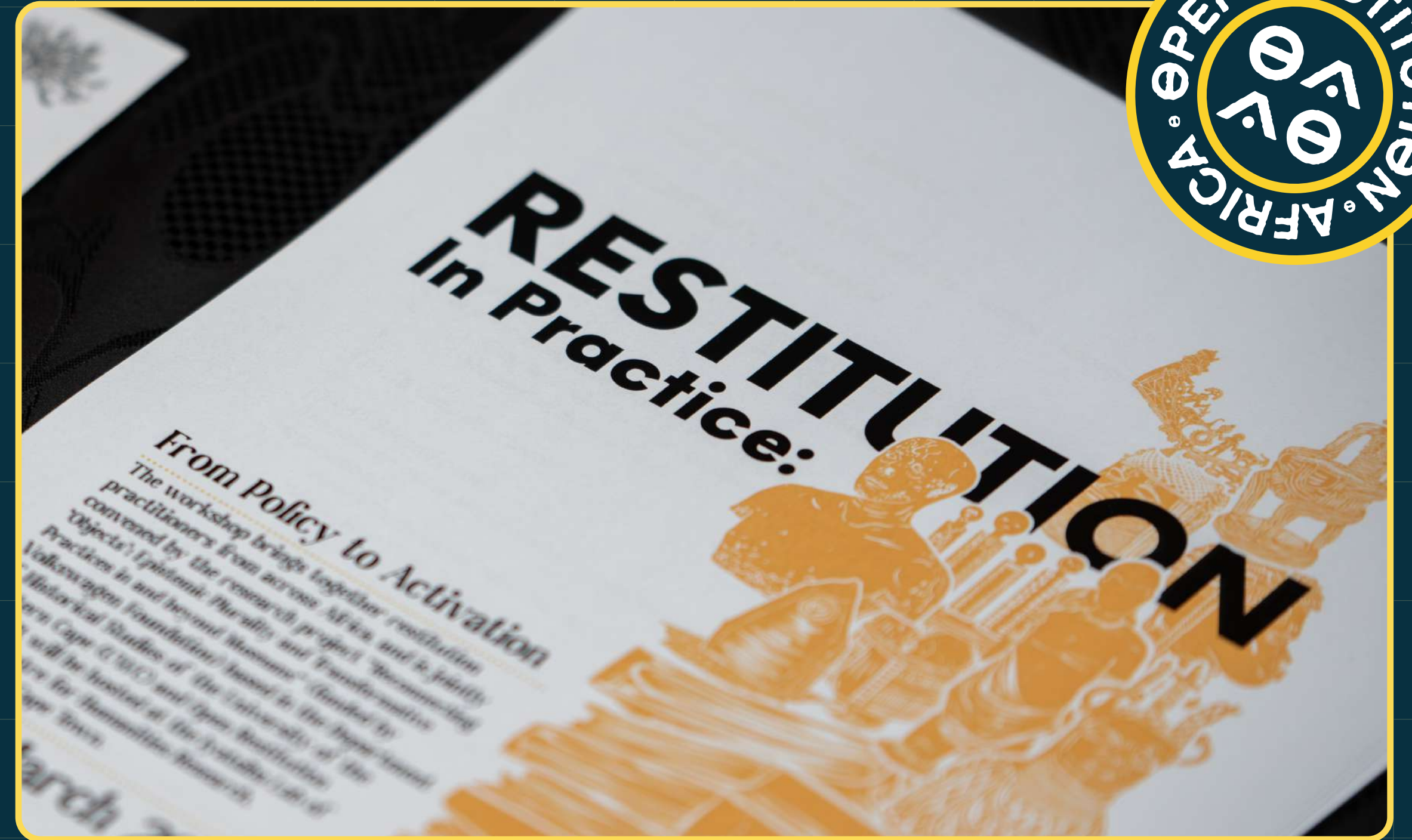
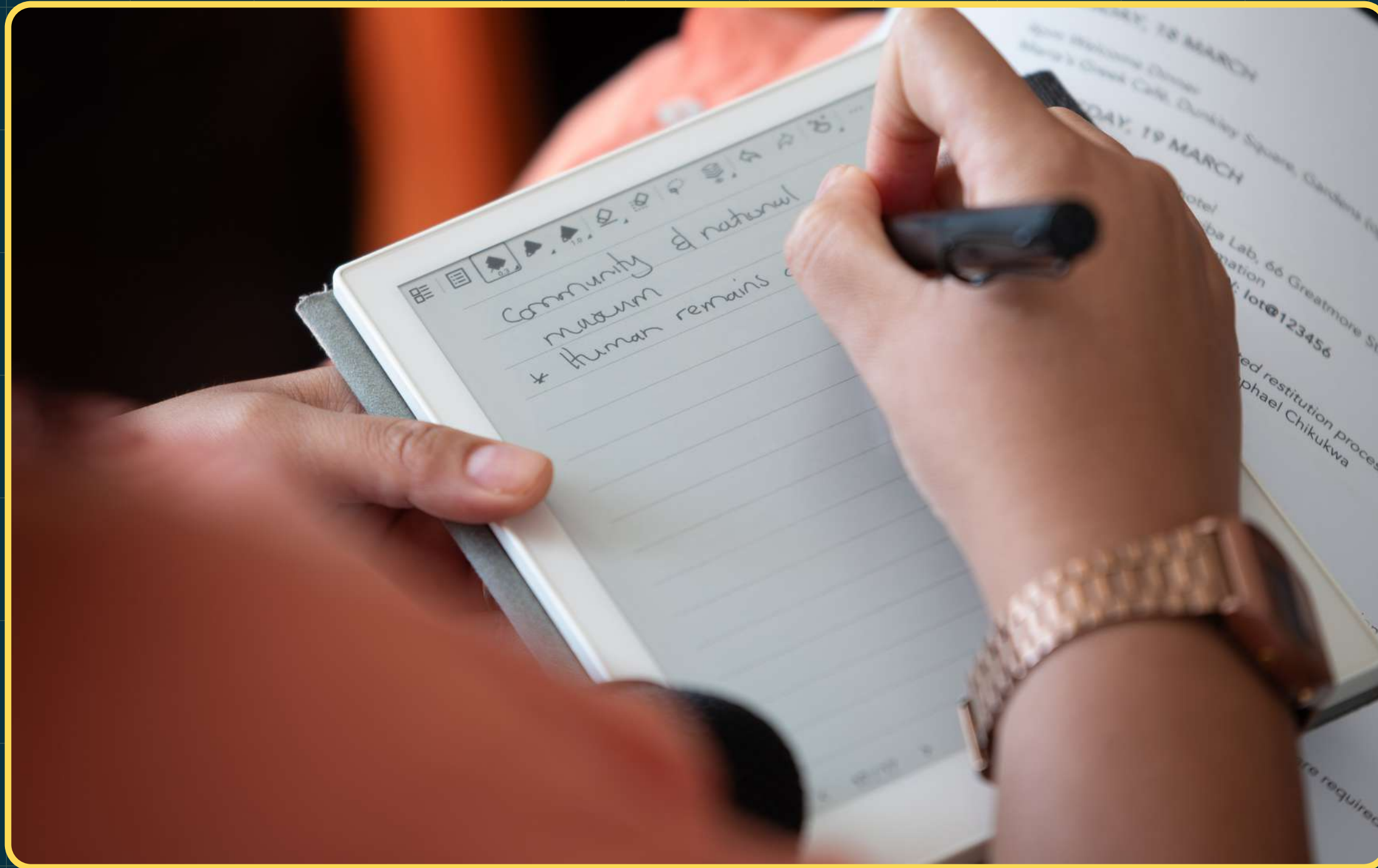




Building Restitution Frameworks

An African Practitioner's Guide

“The exercise on which we are embarking is part of the process of restoring dignity to our people, dignity to humanity in general, and we should be at peace with ourselves, heal and build new relationships among ourselves as Africans. Once we have that, we’ll be in a better position to engage with our neighbours.”

- Prof Kodzo Gavua



003

Introduction

Developing robust restitution frameworks is crucial to advancing restitution in Africa, yet many countries struggle to navigate the multiple technical, legal, diplomatic, and cultural dimensions involved.

In the context of this document, the term “framework” is used broadly to encompass the various tools and instruments that guide restitution work—including protocols, position statements, guidelines, manifestos, and eventually formal policies.

A framework may begin as a simple position paper that articulates a country’s stance on restitution, evolves into protocols that outline processes and stakeholder roles, and ultimately informs comprehensive national or regional policies. The purpose of this guide is to outline fundamental considerations when developing such frameworks, specifically in Africa. This is informed by the recognition that countries

are at different stages of readiness and that meaningful progress can begin long before formal legislation is enacted.

These steps, drawn from lived experience and proven strategies, can help build momentum toward national and regional policies while respecting the urgency and complexity of restitution work. This guide is developed through a series of conversations with leading African restitution practitioners who leverage their experience and insight across multiple sectors, from academia to museums, government commissions and civil society.

Their voices remind us that restitution is not a straightforward process, but a complex, relational journey that requires careful navigation, multi-stakeholder collaboration, and above all, the centering of community agency and dignity. This guide is offered as a tool to help you start where you are, with what you have, to move restitution work forward.

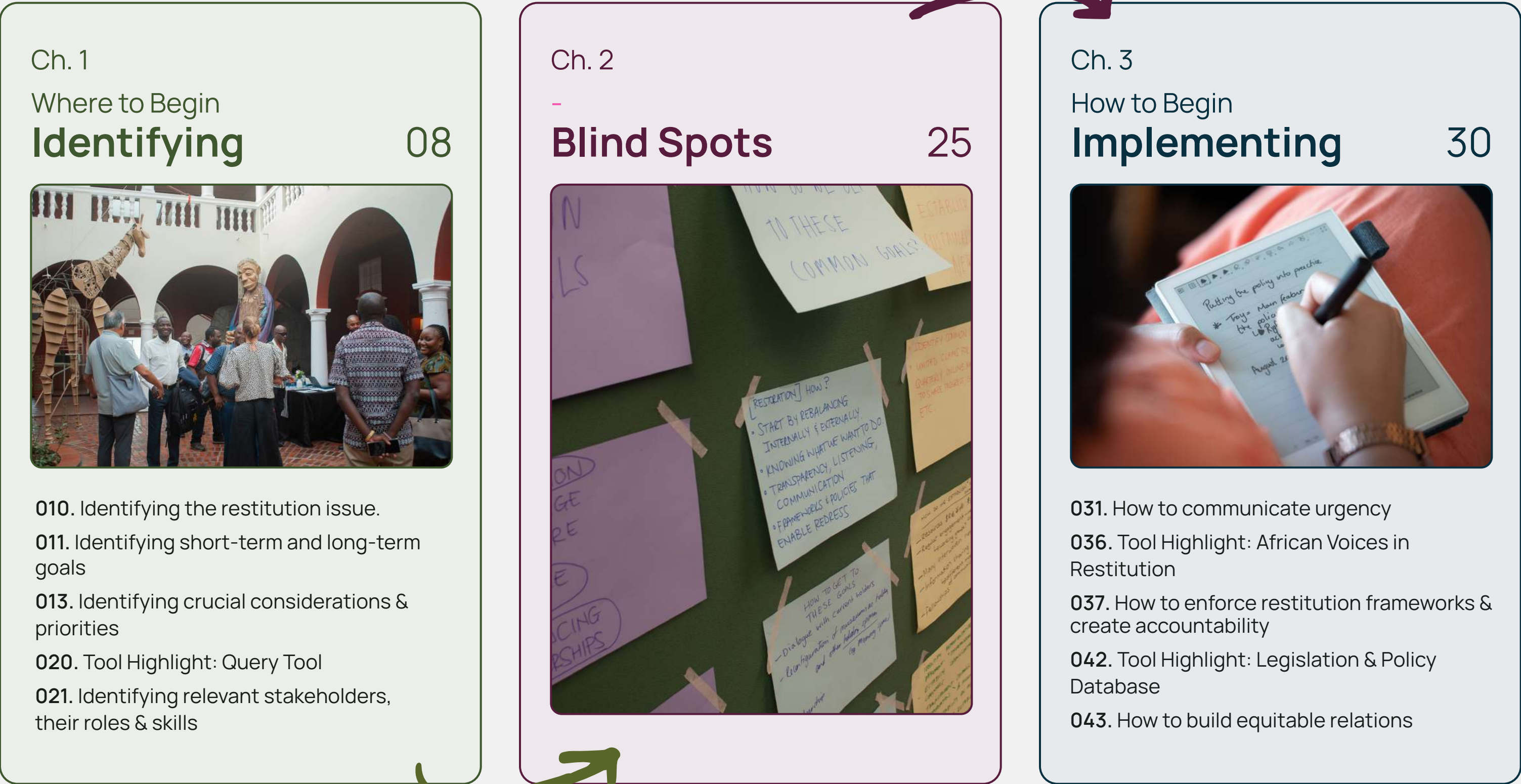
What's Inside

004

This guide is structured around three main sections that follow the restitution framework development journey:

- In the **first section, Where to Begin**, we outline strategies for identifying the foundational elements of one's restitution needs.
- In the **second section, Blind Spots**, we leverage our research data and the experiences of African practitioners to outline common pitfalls.
- Finally, in the **third section, How to Begin**, we set out actionable steps towards implementing restitution frameworks.

Each subsection includes case studies and references to tools that demonstrate how countries and practitioners have navigated similar situations in the African context.



Contributors

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We wish to thank contributors, reviewers, and the communities/ communities of practice whose experiences informed this guide. It was developed through an extensive discovery process, drawing on in-depth conversations with a carefully selected group of African restitution champions.

These practitioners were chosen for their ongoing, hands-on knowledge of African-centred restitution work and processes, and represent a breadth of experience across academia, museums, government commissions, and civil society. Their insights are further grounded in documented case studies from across the continent and research data gathered by Open Restitution Africa on restitution processes and outcomes.

Dr. Babatunde E. Adebisi

Lawyer, Administrator & Director Legal Services at the National Commission for Museums and Monuments of Nigeria.

Dr. Babatunde Adebisi is the Director Legal Services of the National Commission for Museums and Monuments of Nigeria. He is Nigeria's legal counsel at international forums regarding heritage return claims. He is also a resource person to both ECOWAS and AU on restitution. He is a member of the Benin Dialogue Group, The Restitution Forum Switzerland, ICOMOS and the ICOMOS Climate Change and Heritage Working Group in Nigeria. His writings include: Legal and other Issues in Repatriating Nigeria's Looted Artefacts, Towards the Perfect Law for Heritage Protection and Management, Return or Recirculation? and The Fault is not in Our Stars.

Dr Goodman Gwasira

Senior Lecturer, University of Namibia.

Dr Goodman Gwasira holds a PhD in History from the University of the Western Cape, focusing on the history of archaeology in Namibia. He is a senior lecturer and head of Museology and Heritage Studies at the University of Namibia. He previously worked as a curator of archaeology at the National Museum of Namibia. His research interests include the practice of restitution of ancestral remains and cultural property, critical archaeologies, Palaeolithic art and cognitive development, history of archaeology and museum anthropology. He is the coordinator of the University of Namibia's Heritage Outreach Programme.

Contributors

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Professor Kodzo Gavua

Archaeologist and Ethnologist, Associate Professor, University of Ghana.

Professor Kodzo Gavua is an archaeologist and ethnologist at the University of Ghana. His research focuses on the legacies of cross-cultural interactions, heritage and human development in Africa. He is engaged in the archiving and use of the past to foster social cohesion and justice, restitution processes and provenance research, and the reconfiguration of museums to reflect alternative histories and narratives. He chairs Ghana’s National Commission for UNESCO’s Cultural Committee and Ghana’s Focal Team on Restitution and Repatriation. His publications include The Politics of Heritage in Africa, (2015), which he co-edited with Derek Petersen and Ciraj Rassool.

Victoria Phiri Chitungu

Director, Livingstone Museum.

Victoria Phiri Chitungu is Director of Livingstone National Museum in Zambia. She is a cultural historian who specializes in the documentation of Zambia’s cultural heritage. She has working knowledge of African centered restitution discourse and debates having worked on restitution cases associated with Africa. In 2025, she was part of the Fourth Cohort of Researchers on restitution processes for Open Restitution Africa. She is a Speaker in AFRICA TALKS 2026 that is exploring debates on restitution, digital heritage, cultural rights and accessibility. She is a Board Member for the African Museums and Heritage Restitution Organization (AFRIMUHERE).

Professor Kimani Njogu

Linguist and cultural scholar, Founder and Director Twaweza Communications Center, Nairobi.

Professor Kimani Njogu is the Director of Twaweza Communications Center, an arts, culture and media organization based in Nairobi. A graduate of the University of Nairobi where he studied literature, Kiswahili and education, he received his Ph.D in Linguistics from Yale University in 1994. He serves as a Commissioner of Kiswahili Cross-Border Language Commission at the African Academy of Languages (ACALAN) and coordinates the Creative Economy Working Group in Kenya. His books include Swahili in Spaces of War: A Sociolinguistic Odyssey (with Alamin Mazrui), Zilizala (a play) and Reading Poetry as Dialogue: An East African Literary Tradition. He is a co-author of the Kiswahili monolingual dictionary Kamusi ya Karne ya Ishirini na Moja (21st Century Dictionary).

Open Restitution Africa

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Open Restitution Africa is an Africa-led project founded by Chao Tayiana Maina (Kenya) and Molemo Moiloa (South Africa) that seeks to open access to information on the restitution of African material culture and human ancestors. The project gathers data on current restitution processes across the African continent; serves as a portal for case studies and best practice examples; and encourages data-informed, in-depth debate on the complexities, responsibilities and ethical imperatives of restitution.

Founded on three main pillars—transparency, access and centralisation—ORA develops an open data platform to enable data-driven approaches to restitution, particularly for African stakeholders. With support from the Mellon Foundation, ORA has funded researchers through micro grants to collect data about individual restitution efforts and compile case studies that reframe narratives around return, restitution and repatriation. This women-founded, continent-based initiative works to centre African voices in restitution discourse.

Chao Tayiana Maina

Co-Founder

Molemo Moiloa

Co-Founder

Karen Ijumba

Senior Researcher

Syokau Mutonga

Operations Associate and Research Associate

Phumzile Nombuso Twala

Research Associate





02 Where to begin: Identifying



Developing frameworks for restitution begins with identifying the specific communities of practice that the framework should serve. Effective restitution processes should draw on pre-existing relationships, local knowledge, and grassroots networks to build sustainable momentum and ensure long-term buy-in.

By establishing clear objectives, countries and practitioners can move beyond ad-hoc approaches toward systematic, replicable frameworks that honour community agency while achieving wider national objectives.

Key Sections

- Identify the restitution issue
- Identify short-term and long-term goals
- Identify critical considerations and priorities for your restitution framework
- Map out relevant stakeholders and the roles they play

“Do not wait for permission from governments, the global north, or museums to start a restitution process. Start where you are. Time is a critical factor in restitution matters.”

- Goodman Gwasira



Identifying the restitution issue

Before establishing goals, it is essential to identify the specific restitution issue that needs to be addressed. This step grounds your approach in real challenges and concerns rather than abstract aspirations.

Effective frameworks start with core questions about scope and context. What belongings, embodiments, or human ancestors are targeted for restitution? Where are they currently located? What were the circumstances of their removal?

Consider potential barriers: Are legal frameworks absent? Are holding institutions unresponsive?

Mapping these issues creates clarity about what needs to change, which stakeholders must be engaged, and which strategies may prove most effective. This approach ensures that subsequent goals and actions directly respond to the realities faced.

Dignity restoration and internal healing should be regarded as foundational principles of approaches pursued. Consider that restitution aims to restore dignity and facilitate healing, not merely transfer belongings.

Identifying short-term and long-term goals

011

It is important to clearly outline the goals of a restitution framework. This allows for a more targeted approach that can be linked to specific action points. Short-term goals can focus on laying foundations and long-term goals on deeper structural investments. Blending short-term goals that prioritise community needs with wider national

goals around cultural revitalisation ensures restitution successes are not tied to one-off cases but can be replicated at a wider scale across multiple instances.

Below are some examples of both short-term and long-term goals. These may vary according to different contexts.

“We must develop the policies; we must develop the guidelines; we must develop those tools that can be used by progressive leaders and individual public officers wherever they are, to move things forward.”

- Prof Kimani Njogu



Short-Term Goals	Long-Term Goals
Legal and policy foundations: • Create a repository of existing policies. • Draft a restitution position statement. Institutional structures: • Designate certain institutions/groups as focal points, with clear and accessible communication channels. Awareness and information: • Create public awareness campaigns • Compile basic inventory of known restitution cases, contacts, and needs. • Compile case studies to learn from others' experiences. Community engagement: • Involve communities from the onset of projects.	Infrastructure capacity and development: • Build and strengthen infrastructure that will take care of restituted heritage. • Integrate restituted belongings into living cultural practices, not just museums. When museums are to be established, they should be established in the spaces where the cultural belongings were removed. • An example is in Nigeria, where the Palace Museums in Ife, Owo, Osogbo, etc. have been established. Thus, the need to balance the requirements of national laws, demands of international conventions, and the importance of traditional institutions are realised. Knowledge Production • Decolonise knowledge and knowledge production by developing new methods of assembling knowledge about cultural belongings • Sustain restitution efforts by involving younger generations in core discussions and activities • Leverage indigenous knowledge systems and promote narratives that centre the agency of communities engaged in restitution • Leverage digital technologies to create awareness. Nigeria, for example, has established the Digital Museum Platform, an initiative that also aims to attract more youth engagement. Continental coordination and unity: • Coordinate restitution efforts across Africa by establishing networks with practitioners in other countries. • Establish regional policy and legal framework harmonisation. • Strengthen regional bodies' roles towards facilitating joint negotiation strategies.

Identifying critical considerations & priorities

Strategic early actions can build credibility and unlock long-term political will. Developing national restitution protocols can seem like a mammoth task; however, success lies in identifying what resources, conventions, and skill sets are available to get the ball rolling.

Here we identify critical priorities for restitution frameworks and outline some of the strategic actions that can respond to the respective priority areas.

“I have learned that restitution is not a straightforward process but a very complex one that requires careful navigation and multi-stakeholder collaboration.”

- Victoria Phiri



Priority	Strategic action
Establish sustainable funding mechanisms	• Explore innovative models for collaborative funding by sourcing funds through channels such as diaspora contributions or partnering with civil society organisations to access foundation grants for grassroots work. • Prepare to negotiate for capacity-building support in international agreements—not just for infrastructure.

014



Illustration from the Bamendou Tukah Mask Ceremony

Evidence

Case Studies: The Return of Ngadji: A Sacred Drum Stolen From the Pokomo People; The Restitution Journey of Ngonnso from the Nso Kingdom; Bamendou Tukah Mask.

Arts, Culture, and Heritage is one of the, if not the most, unfunded sectors in Africa. Restitution, as an event of physical return, is also financially arduous. Placing the entire financial responsibility for restitution on already constrained budgets in these Ministries and Departments is, thus, unrealistic. We must think outside the box.

Move beyond thinking about restitution as an act of physical return, and start thinking about it as restitutionary work: a multi-layered process of repair and restoration for harm caused at community, local, regional, and international levels. In the Pokomo Community in Kenya as well as the Nso and Bamendou communities in Cameroon, the work of restoring/reviving cultural identities—and the practice of festival making that historically engendered



this—has led to knowledge restitution, cultural repair, community network building, and investment in socio-economic development in the respective regions.

These activities have been funded by local government, diasporic communities, and local businesses, generating income for further restitutionary work. The resultant effect is that the demands for the return of Ngadji (Pokomo's sacred drum), Ngonnso, and the Bamendou Tukah Mask have been amplified while, at the same time, the different types of ruptures that were experienced by communities as a result of their removal have been addressed.

Ngadji >

Ngonnso >

Bamendou Tukah Mask >

Start thinking about other areas of growth with which restitutionary work intersects and how that can be extended to move a particular objective in your region's restitution efforts forward.

Evidence



Case Study: The Repatriation of Ife Cultural Objects; Restoring Royal Legacy: The Return of 119 Benin Bronzes from the Netherlands to Benin City.

In Nigeria, the large-scale return of Benin Bronzes from across the world has been enabled by the sustained effort of two bodies over two decades: the National Commission for Museums and Monuments (NCMM) and the Benin Dialogue Group (BDG).¹

The NCMM was established in 1979; however, in 2004 it was specifically mandated by the National Commission for Museums and Monuments Act (CAP N19, LFN 2004) to claim ownership of Nigeria's cultural belongings and to take all necessary legal and diplomatic steps for their recovery. This statutory body has since been central to strategising and coordinating Nigeria's restitution efforts, including: initiating demands; negotiating terms of return from holding institutions; undertaking conservation, curation and documentation of returned belongings; publicising returns through the media; and facilitating dialogues and agreements between the state, traditional leaders, and communities of origin.

A critical development was the establishment of the Benin Dialogue Group (BDG), formalised at its first meeting in Vienna in December 2010. The BDG was informally established in 2007 following the launch of an international touring exhibition, *Benin Kings and Rituals: Court Arts from Nigeria*, that displayed over 300 Benin Bronzes from 25 lending institutions. Bringing together museum directors from Austria, Germany, the Netherlands, Sweden, and the United Kingdom alongside Nigerian representatives, the BDG prioritised constructive dialogue over confrontation, a deliberate departure from the more adversarial postures adopted at the Egypt 2010 Conference.

This collaborative approach yielded significant outcomes, including the launch of Digital Benin, a database of over 5,000 looted belongings, and the establishment of the Museum of West African Art (MOWAA) as a dedicated repatriation and heritage facility.

[Ife Cultural Objects >](#)

1. The NCMM was established in 1979 by Military Government Decree Number 77. This Decree has metamorphosed into the Act of 2004, which the Commission set up by the law. The National Commission for Museums and Monuments Act (CAP N19, LFN 2004) has been utilised to claim ownership of Nigeria's cultural belongings and to take all necessary legal and diplomatic steps for their recovery.

Priority	Strategic action
Focus on setting up clear focal points and contact points.	Establish a dedicated focal point or unit comprising representatives from government ministries, heritage institutions, traditional authorities, and civil society. Its main purpose is to coordinate all restitution activities – managing claims, diplomatic communications, and stakeholder relations – while maintaining institutional memory and ensuring processes remain community-centred and accountable over time.

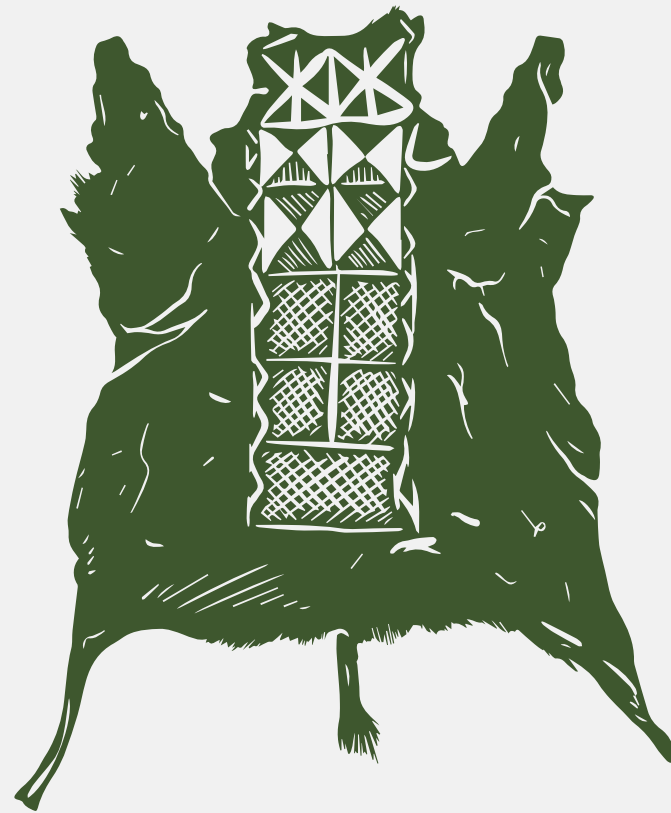
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Priority	Strategic action
Create a position statement.	Develop a short, clear “Restitution Manifesto” or position statement. This document would officially outline the country’s/community’s stance, demonstrate political will, and serve as an initial guide for all stakeholders. Ensure ease of accessibility to this document.
Leverage existing legislation and agreements.	Immediately use international and regional conventions to which the country is already a party (e.g., UNESCO, AU) to frame arguments and legitimise claims. This does not require creating new laws from scratch. Pursue or strengthen existing bilateral agreements (like the US-Nigeria Cultural Property Agreement) that facilitate returns without costly litigation.
Build momentum and increase public awareness.	Focus initial efforts on the repatriation of human ancestors (and other human body parts, often dismembered and stored as skeletal and soft tissue remains) and belongings connected to their personhood, which often resonates deeply with source communities and the broader public. These cases can demonstrate tangible progress, bring profound closure, and create moral urgency that galvanises both institutional cooperation and citizen pressure on decision-makers. Use social media, public talks, community outreach (meetings and workshops), and exhibitions to inform citizens about restitution —what it is, why it matters, and what is being done. This builds a constituency of support and puts pressure on decision-makers.

Evidence



Case Study: Redressing and addressing the Lechwe Skin Cloaks of the Batwa people of the Bangweulu Swamps of Zambia: 1912-2025.

In Zambia, a digital intervention served to reconnect Zambians and communities of origin to their belongings abroad even before physical return could be pursued. In 2018, Samba Yonga—co-founder of the Women's History Museum of Zambia (WHMZ)—was informed of the African Collection at The National Museums of World Culture, Sweden, which contained +/- 800 Zambian belongings. She was advised that the physical return of belongings was strictly governed by Swedish laws that

make determinations on a state-to-state, case-by-case basis, a process that could take years. To circumvent this, Yonga and fellow co-founder of WMHZ, Mulenga Kapwepwe, undertook a collaborative museum-to-museum digital repatriation project, Shared Histories. Through this project, they were able to gather knowledge from communities of origin, make 100 of the Zambian belongings digitally accessible, generate dialogue through artistic interpretations of the belongings, and lay the foundation for physical return to be pursued in the future.

[Lechwe Skin Cloaks >](#)

Rethinking Inventories for African-led Restitution



The Inventories Report policy brief argues that comprehensive national inventories that catalogue all African cultural belongings worldwide are resource-intensive and often unviable. It advocates instead for strategic support of community-led, demands-based restitution databases that prioritise grassroots mobilisation over exhaustive cataloguing, demonstrating that inventories alone don't guarantee returns.

[Link >](#)

Prioritise existing resources to align with community needs and support ongoing restitution processes.

Tool:

Query Tool

Our AI-powered tool lets you query the dataset directly. Where the data holds an answer, it will surface relevant examples for you to explore further.

[Link >](#)



Identifying relevant stakeholders, their roles and skills

Multi-stakeholder participation is key to the lasting impact of restitution processes. Government ministries, customs officials, heritage institutions, researchers, local authorities, activists, and legislators all have a vital role to play. It is important that restitution frameworks and policies outline these roles; this allows for the harmonisation of efforts towards shared goals. In the same way that restitution demands mutli-stakeholder participation, it also requires multidisciplinary capacity.

In the section below, we outline various groups of stakeholders, the roles they play within the restitution process, and the skills they require to implement these roles effectively. This table can be used to carry out a mapping exercise that you can use to determine who should be involved as well as how to allocate financial and human resources accordingly.

“It’s absolutely critical that, whatever we do, we must put the community at the centre. The African community must be at the centre of all the work, from conceptualisation to implementation... Even as we are talking about reimagining, you know, the role of the various actors—whether it is actors in academic institutions, whether it is institutions—we need to ask the question: Why is all this work necessary?”

- Prof. Kimani Njogu

Stakeholder	Role	Skills
Governmental, regional, and inter-governmental bodies	Various ministries within national governments: To enact and enforce national restitution laws, provide funding, lead diplomatic negotiations, and ratify international conventions. African Union (AU): To develop a shared continental vision, harmonise legal frameworks, and provide diplomatic support for member states’ claims. Regional bodies (SADC, ECOWAS, EAC): To align regional policies, facilitate cross-border cooperation, and strengthen collective bargaining power. Customs and border agencies: To prevent illicit trafficking of cultural heritage and facilitate the legal return of restituted items.	Community engagement and facilitation: • Deep listening and dialogue • Consensus building and mediation • Understanding cultural protocols, spiritual practices, local languages • Trauma sensitive engagement Project management and coordination: • Inter-ministerial coordination • Stakeholder mapping and management • Logistics and planning
Cultural and heritage institutions	National Museum Boards/Heritage Councils: To oversee national collections, lead research, and implement government restitution policies. Museums and cultural institutions: To act as facilitators of restitution processes, provide ethical stewardship, ensure provenance transparency, and partner in reparatory justice, potentially serving as sites for reflection, dialogue, and community reintegration	Community engagement and facilitation: • Deep listening, information exchange, and dialogue • Consensus building and mediation • Understanding cultural protocols, spiritual practices, local languages Research and provenance investigation: • Archival research • Provenance tracking • Oral history collection • Documentation of contemporary contexts of use • Digital data management Technical and infrastructural skills: • Collections management and conservation • Museum and archive management • Digital repatriation

Stakeholder	Role	Skills
Communities and traditional stakeholders	Affected/source communities: To be the primary interpreters and narrative holders of their heritage, co-create restitution programmes, and define how restituted items should be cared for and used. Traditional authorities: To provide cultural and historical context, guide reintegration rituals and processes, and mediate between communities and the state.	Communications and advocacy: • Strategic messaging • Public awareness campaigning • Media engagement
Academic and research institutions	Research networks: To conduct comparative studies, produce and share knowledge, and build a body of evidence to support restitution claims, policy development, and restitution processes. Academics and universities: To conduct provenance research, document histories, develop restitution curricula, and provide neutral spaces for dialogue and advisory support.	Research and provenance investigation: • Archival research • Provenance tracking • Oral history collection • Documentation of contexts of production and use • Digital data management
Diplomats and legal advisors	To help draft legislation and policies, provide legal oversight, and ensure ethical and transparent processes.	Legal and policy expertise: • International cultural heritage law • National legislation drafting • Negotiation and diplomacy
Civil society and community-based organisations	Civil society: To provide linkages with communities and undertake advocacy, lead on developing capacities and provide awareness about key issues, and monitor and document progress being made. Community-based organisations: To implement restitution protocols at the grassroots level and ensure post-return support for communities and returned items. These play an important role by facilitating dialogue, translating community needs into advocacy, monitoring implementation, and securing independent funding. They enable communities to assert agency outside government structures.	Advocacy, documentation, monitoring and communication: • Advocacy skills • Documentation • Monitoring • Strategic communication Communications and advocacy: • Strategic messaging • Public awareness campaigning • Media engagement

Evidence



Case Study: The Repatriation of Sara Baartman.

The repatriation of Sara Baartman — a KhoeSan woman whose body cast as well as her skeletal and soft tissue remains were displayed at the Musee de l'Homme in France up until 1974 — was a multi-year and multi-stakeholder process.

[Link >](#)

02



Blind Spots

Within the broad scope of restitution processes, certain dimensions are frequently overlooked or considered too late. This section identifies common blind spots that weaken restitution efforts. Recognising these gaps early allows practitioners to strengthen their frameworks, avoid repeating documented failures, and build restitution processes that achieve genuine, long-term impact for communities

Key Sections

- Identify the restitution issue
- Identify short-term and long-term goals
- Identify critical considerations and priorities for your restitution framework
- Map out relevant stakeholders and the roles they play

“It’s discovering who your allies are, especially where the allies also know their weaknesses and limitations, and working with them to enable them to deliver your objectives and your goal.”

- Prof Kimani Njogu



Blind Spots	
Failure to make reintegration considerations:	There is often a failure to plan for the long-term care, use, and reintegration of cultural belongings and ancestral remains into community life.
Insufficient intergenerational and youth engagement:	Restitution efforts can become dominated by senior established leaders and experts, failing to secure the continuity of knowledge and passion needed to sustain the movement.
Sidelining spiritual and emotional dimensions:	The focus of western frameworks on legal and physical transfer can ignore and marginalise the profound spiritual significance of belongings and ancestral remains.
Lack of united continental/regional approach:	Countries often work in isolation ('silos' or 'bubbles'), leading to fragmented efforts. This reduces their collective bargaining power and allows external institutions to dictate terms bilaterally. Are there other countries that have engaged in processes similar to yours?
Separating material belongings and ancestral remains:	Policy often treats material culture and human ancestral remains separately, failing to understand that, in many African contexts, certain belongings are also considered to be living ancestors with a spiritual essence. Also, humans are not separable from their material culture. Each case should therefore be treated on its own terms, guided by the specific cultural and community context, rather than pre-conceived assumptions that either group them together or separate them categorically.

Evidence

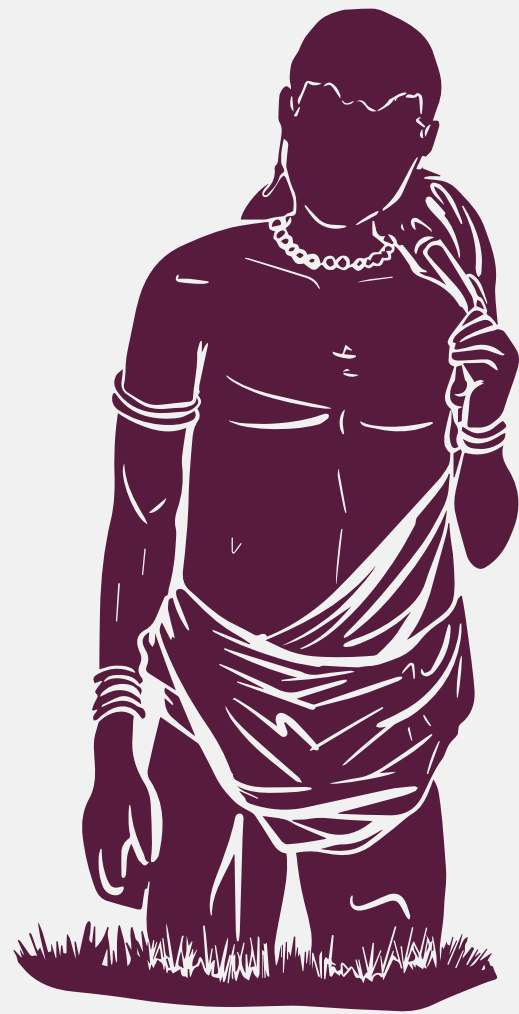


Case Study: Offer to Return 30 Vigango.

Vigango are memorial funerary posts originating from the Mijikenda community in Mombasa, Kenya. In the late 2000s, the National Museums of Kenya (NMK) began receiving offers to return Vigango that had been stolen from various families and illicitly trafficked before finding their way into private and public collections. These offers largely came from American institutions who were only willing to bear the cost of transportation back to Kenya. Most of these institutions did not engage directly with the Mijikenda community, inadvertently transferring this responsibility to NMK as the national custodian of cultural heritage. This hands-off approach to return, and failure to plan beyond it, has had a number of negative impacts. The first is that NMK has now been saddled with the labour of reconnecting the returned Vigango with families, a near impossible task without further information around when, from where, and by whom the Vigango were removed. Secondly, transferring

custodianship to the museum, rather than the community, has created tension between NMK and the Mijikenda community, who themselves have conflicting views on where the returned Vigango should rest. Lastly, the returning institutions did not consider the holistic impact of the removal of the Vigango, which are embodiments of a spirit and a conduit of communication between the living and the dead. These impacts include the rise of mental health issues in the community that are linked to angered and restless ancestors as well as harsh socio-economic conditions that are attributed to a lack of protection from ancestors who were removed. Failure to acknowledge the dimensions of loss experienced means the physical return of the Vigango has not meaningfully addressed or repaired the harm that was done when they were removed.

30 Vigango >



Case Study: Masalela a monna wa Mosarwa a boetse gae: The remains of the Mosarwa man have returned home.

Monna wa Masarwa, popularly known as El Negro de Banyoles, was one of the first human ancestors to be repatriated to Africa, and stands as testament to the need for community engagement, research, and long-term planning before repatriation. His repatriation was largely advocated for by the United Nations (UN), the Organisation of African Unity (now African Union), and diasporic communities in Europe and North America. In a rush to secure a country to return him to, Botswana was selected on the basis that it had the largest San community at the time. A number of local researchers and heritage professionals believe that he was, in fact, a descendant of the Batlhaping, a Tswana tribe in South Africa, while Spain has yet to reveal the findings of their scientific testing of his origins. It is, thus, possible that he

was reburied in the incorrect country. Secondly, since his repatriation was negotiated at a diplomatic and political level, local museum and heritage practitioners were not meaningfully included in developing a maintenance plan for his reburial site or creating an education programme for Batswana, particularly the youth, to learn about dark colonial pasts and practices as planned. As a result, the site was neglected for a number of years until it was transferred into the custodianship of the Botswana National Museum. Although the site now has signage and is physically maintained by the museum within a broader restaurant complex that attracts tourists, very little has been done to visibilise Monna wa Mosarwa as a symbol of colonial injustice and repatriation/restitution as a means to address these wrongs.

[Masalela a monna >](#)



Case Study: Echoes of Return - Restituting Rwanda's Colonial-Era Audio Archives for Cultural Reawakening and Sustainable Development.

Rwanda and Belgium's SHARE Programme (2019) exemplifies strategic reintegration through youth engagement. The Rwanda Cultural Heritage Academy used this collaborative stewardship initiative to develop cultural heritage skills among young Rwandans. During COVID-19, students supported the digitisation of materials held at Belgium's Royal Museum for Central Africa. Before the 2021 handover of 4,095 digitised sonic recordings—traditional songs, oral histories, chants, and ceremonies—young

heritage practitioners received training in audio-visual collection techniques. In 2023, partnership with ICCROM's Rwanda Heritage Hub enabled youth to develop activation activities: digital heritage education sessions, exhibitions, and video projects that documented artists reimagining the sounds contemporarily. This approach achieved powerful reintegration into Rwandese society, with community ownership and sustained continuity beyond handover.

[Echoes of Return >](#)



03 How to begin: Implementing

Moving from framework design to practice requires strategic action, requiring robust mechanisms for communication and accountability. Implementation is where restitution frameworks encounter their greatest tests.

This section provides practical guidance on three critical pillars of implementation: advocacy and persuasion strategies; enforcement and accountability mechanisms; and intentional approaches to building strong relationships at multiple levels.

Key Sections

- Use compelling communication strategies for stakeholder engagement.
- Create strong enforcement and accountability mechanisms.
- Build equitable relations.

How to communicate urgency

031

Advocacy is a central part of the restitution process, as it provides an avenue to share knowledge and build understanding on the imperatives of restitution. Well-implemented communication strategies can apply necessary pressure on institutions that are reluctant to engage with restitution

requests while sensitising key decision makers on community needs. Strategies should emphasise storytelling that centres dignity, identity, and knowledge preservation, framing restitution within the historical context of loss and removal, while grounding it in the realities of the present.

“Restitution goes beyond the return of items because it involves restoring people’s dignity and values. And also implicit in that is the repair of damages that have been done to the people.”

- Prof Kodzo Gavua



Strategic Action	Breakdown
Start where you are	Restitution work can begin with small, achievable actions that build momentum. As Goodman Gwasira advises, “start where you are.” • Start by documenting community knowledge: convene elders to record oral histories about missing belongings before this knowledge disappears. • Organise a community workshop to discuss what successful return or meaningful restitution looks like, building consensus before negotiations begin. These modest steps require minimal resources but generate tangible progress, demonstrate commitment to sceptical stakeholders, and create precedents that inform larger initiatives.
Frame restitution as a race against time and knowledge loss	Victoria Phiri argues that the urgency lies in “the loss of knowledge.” She states, “People die, stories die, knowledge just disappears before our eyes, and there isn’t time to waste.” Framing restitution in the context of knowledge lost through time urges us to act now and to value knowledge holders while they are still present.
Move the argument beyond politics and economics to the core of human dignity, identity, and spiritual health	Prof Kodzo Gavua argues, “Through our research and through this workshop, we are trying to create awareness, first, among our people to understand the value of these collections with spiritual convictions, so we stop being afraid of our African spirituality and be at peace with ourselves.”
Build a broad base of allies across sectors:	Don’t advocate in isolation. Identify and work with allies within government (MPs, ministries), traditional authorities, the media, and civil society to create a chorus of demand.

Strategic Action	Breakdown
Use media strategically for awareness and to hold institutions accountable:	Use both mass and social media to create public awareness, shape narratives, and hold both foreign and domestic institutions accountable.
Empower communities to speak for themselves:	Shift from a model where experts speak for communities to one where communities are empowered to articulate their own demands directly.

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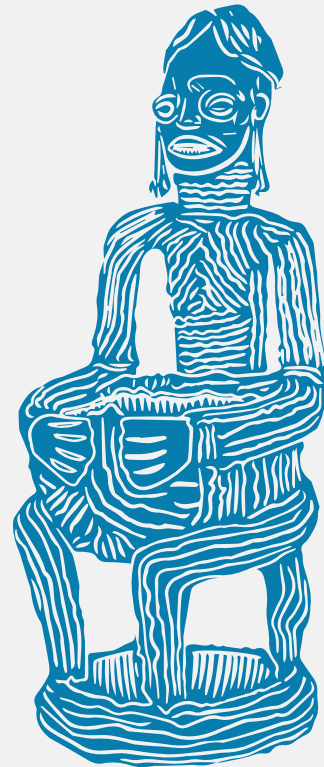
Evidence

Open Restitution Africa's research demonstrates that restitution cases with multiple stakeholders have higher chances of breakthroughs than those with fewer stakeholders.

In more than half of restitution cases, communities' early attempts to contact museums stalled. Breakthroughs occurred when additional stakeholders with distinct roles joined the process.

Evidence

CH.3
HOW TO BEGIN

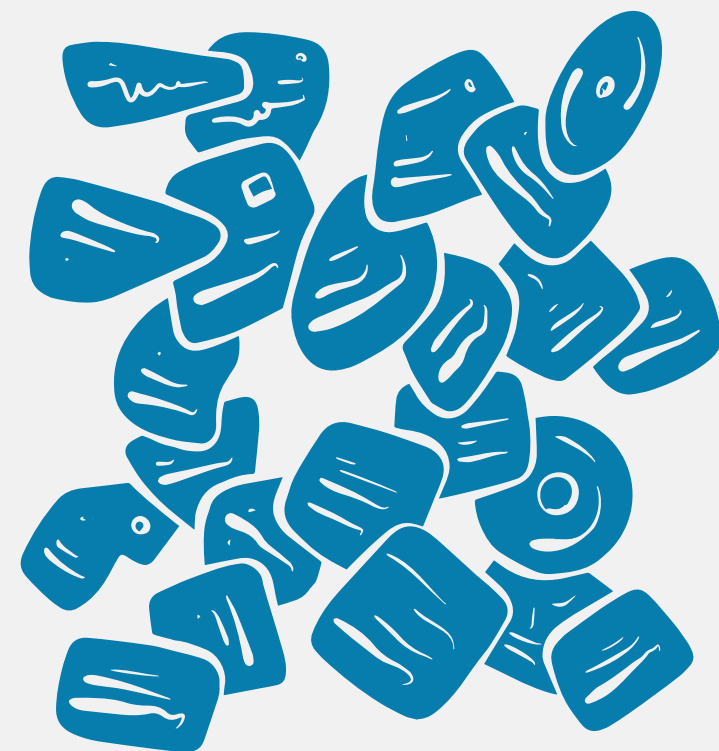


Case Study: The Restitution Journey of Ngonnso from the Nso Kingdom in Cameroon.

In 2020, Cameroonian activist and Nso community member, Sylvie Vernyuy Njobati, launched #BringBackNgonnso. This social media campaign used multimedia storytelling—mainly recordings of Nso community members—to communicate the significance of Ngonnso to the Nso community, the depth of the rupture that had been caused when the

embodiment of the Queen Mother had been removed from Nsoland, and the urgent need for her return. The campaign immediately resonated with Africans on the continent and in the diaspora who have experienced similar losses as well as with German allies who were forced to confront their violent colonial pasts.

[Ngonnso >](#)



Case Study: Confronting Colonial Pasts, Envisioning Creative Futures /Return of 23 Cultural Belongings.

In Namibia, the restitution of cultural belongings forms part of a long-term goal to develop a decolonised, community-centred museum that contributes to the broader cultural and heritage development agenda of the country.

[Link >](#)

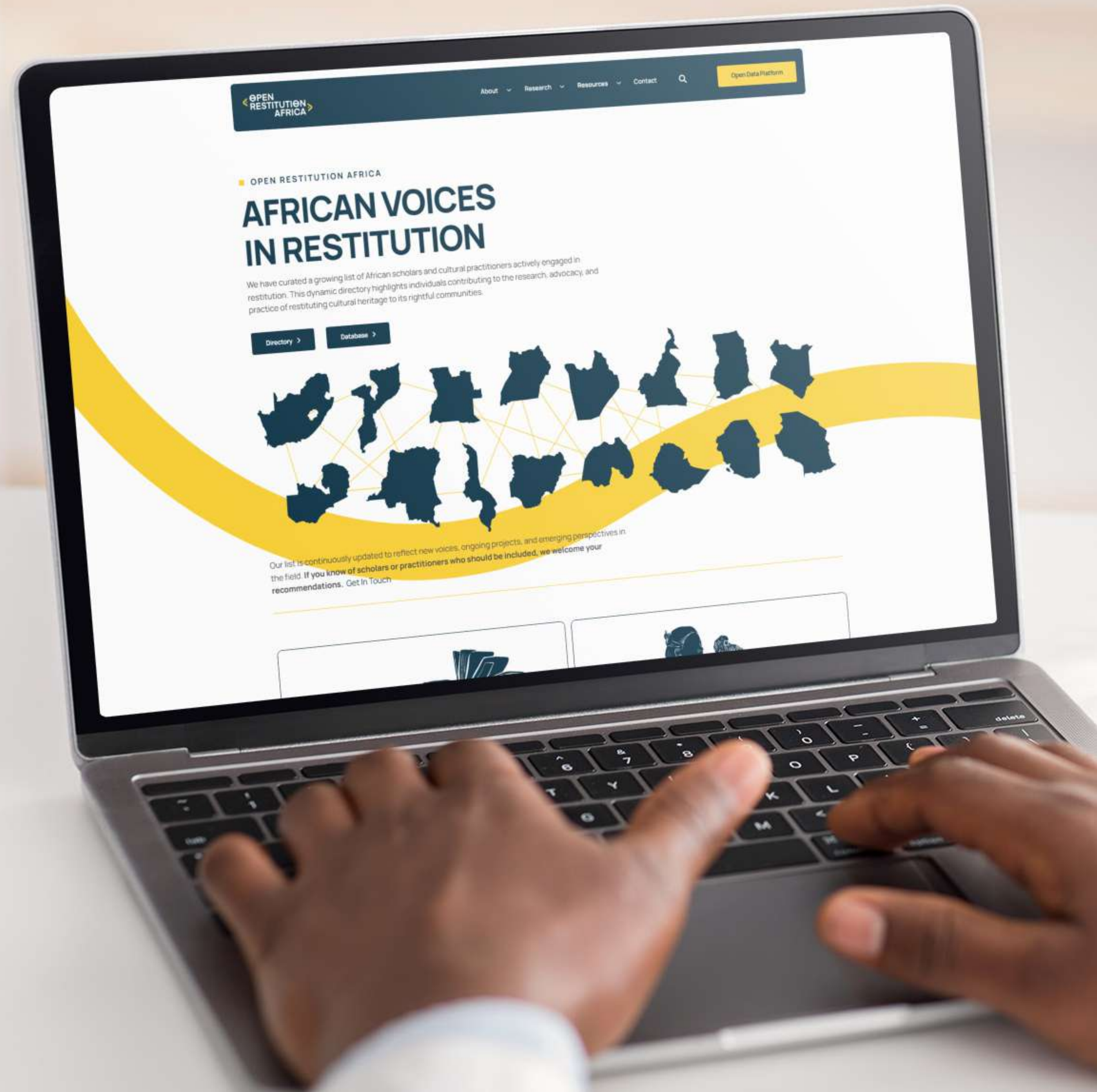
Tool:

African Voices in Restitution

We have curated a growing list of African scholars and cultural practitioners actively engaged in restitution.

This dynamic directory highlights individuals contributing to the research, advocacy, and practice of restituting cultural heritage to its rightful communities.

[Link >](#)

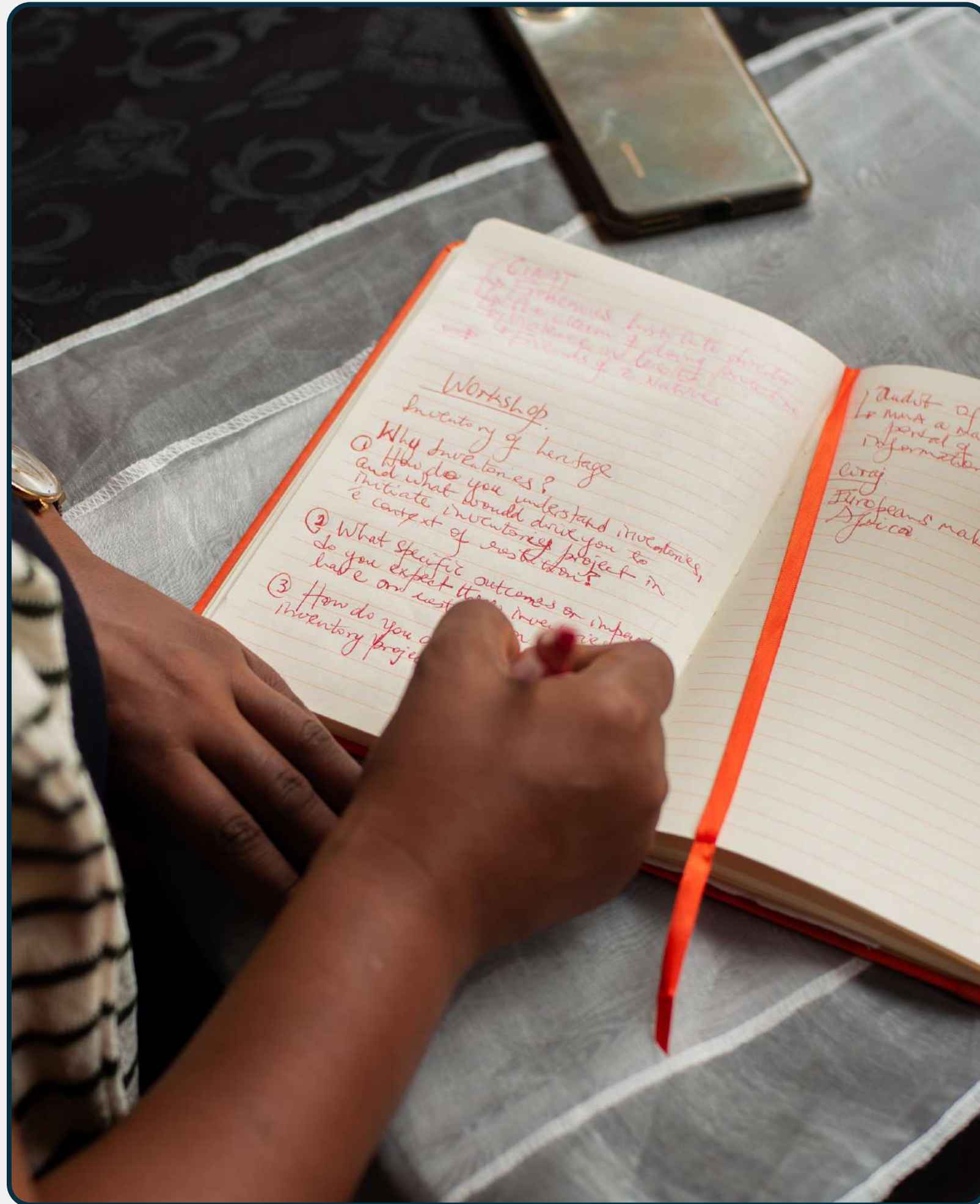


How to enforce restitution frameworks and create accountability

In the section below, we outline areas of activities that are core to successful restitution and the various strategic actions that enable these activities to be undertaken.

“Nigeria’s current ongoing activity to advance restitution policy development is to look into restitution policy documents emanating from other nations, e.g, the draft South African Draft National Policy... and bring out sections that are adaptable to some of our requirements and to coin out provisions from Nigeria’s many practical restitution experiences.”

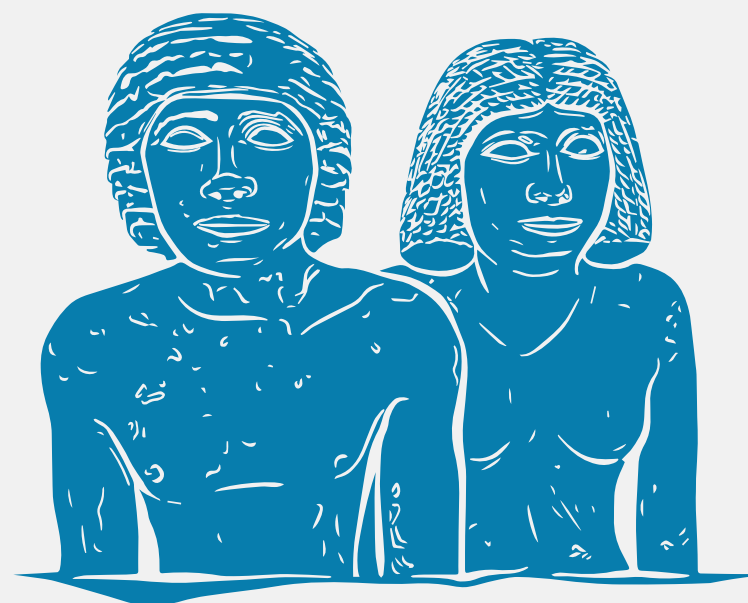
- Dr. Babatunde E. Adebisi



Areas of Enforcement	Strategic Actions
Legal and judicial enforcement	• Binding court orders and legal penalties: Enacting national laws with clear sanctions for non-compliance, such as penalties for illicit export. • Restitution courts/tribunals: Establishing specialised judicial or quasi-judicial bodies to adjudicate claims and resolve disputes. • Bilateral agreements: Creating legally binding agreements between nations that outline specific obligations and consequences.
Administrative and institutional oversight	• Inter-ministerial task forces and audits: Creating cross-government bodies to monitor progress and conduct audits of museum collections and processes. • National restitution commissions: Mandating a dedicated national body to oversee claims, monitor implementation, and liaise with local and international partners. • Customs enforcement: Empowering and training customs agencies to intercept illicit trafficked goods and enforce import/export regulations related to cultural property.
Community-led and social accountability	• Community restitution committees: Establishing local committees to ensure source community voices shape priorities and provide ongoing oversight of the post-return process. • Public campaigns and legal advocacy: Using public pressure, media campaigns, and strategic litigation by civil society to hold governments and institutions accountable. • Community oversight of research Involving source/affected communities in monitoring restitution processes and ongoing research related to their heritage.

Areas of Enforcement	Strategic Actions
Transparency and information-based mechanisms	• Publicly accessible databases: Creating and maintaining open-access databases of belongings and ancestral remains in museums, enabling source communities to make claims and track progress. • Clear reporting lines: Implementing transparent reporting structures from implementing bodies back to government and the public to ensure monitoring and follow-up. • Museum-community agreements: Formalising agreements between museums (both domestic and international) and source communities regarding care, access, and use of restituted items. • Fiduciary transparency: Formalising funding agreements and ensuring clear, transparent financial reporting.
International and peer accountability	• Global body scrutiny: Leveraging international bodies like UNESCO’s ICPRCP (Intergovernmental Committee for Promoting the Return of Cultural Property) to mediate disputes and apply diplomatic pressure. • Adherence to ethical codes: Holding institutions accountable to international ethical codes, such as the ICOM Code of Ethics. • Regional body pressure: Utilising African Union (AU) and regional economic communities (e.g., SADC, ECOWAS) to monitor and encourage compliance among member states.

Evidence



Case Study: Selective Memory and the Steindorff Case - What We Choose to Forget.

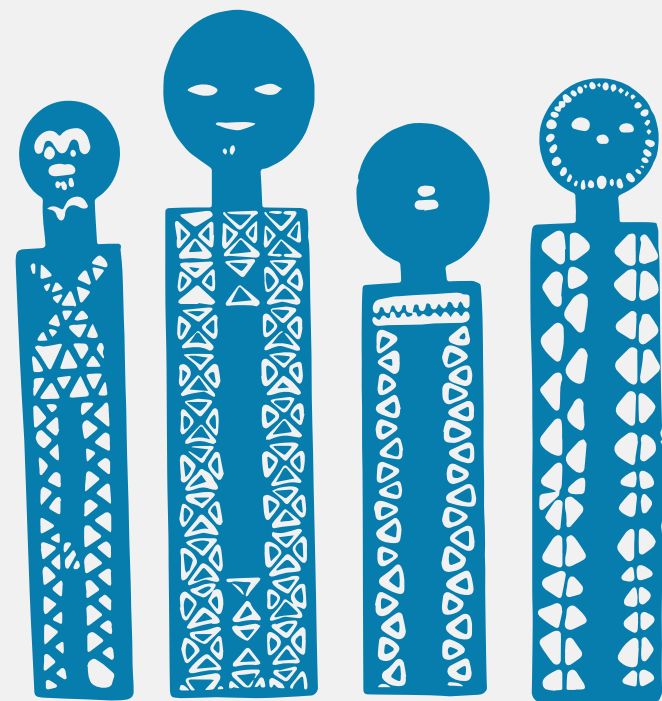
In 2011, when a German Administrative Court ruled in favour of the Claims Conference as the legal successor of Georg Steindorff's collection of Egyptian belongings, held at Leipzig University, it spotlighted the prowess of the machinery that has been put in place to recover Nazi-looted cultural assets. In 1998, the Washington Conference Principles on Nazi-Confiscated Art brought together representatives from over 40 countries—as well as over 10 NGOs, art museums and auction houses—to streamline the process of restituting art obtained during the Holocaust era. During this conference, the Washington Principles were drafted. These 11 guidelines set out key considerations for the development of law, policy, and protocols for countries and institutions that were/are holding Nazi-looted art.

The Claims Conference, a NPO with offices in the USA, Israel, and Germany, has been instrumental in

ensuring that the moral imperatives encompassed in the Washington Principles have come to fruition in tangible ways, particularly in Germany. They have lobbied for the amendment of laws that restricted restitution claims to a specific time period, advocated for the establishment of an arbitration tribunal (Federal Office for Central Services and Unresolved Property Issues [BADV]), created a major database of missing art, negotiated returns on behalf of Holocaust victims and survivors, acted as a legal successor in cases where a known heir could not be identified, and converted cultural assets into monetary compensation or social welfare support for Holocaust victims, survivors, and their families. It is, however, duly noted that in this case, their capacity to enforce restitution overrode the wishes of Georg Steindorff's grandson and the claim made by Egyptians as the originators of the belongings, creating a layer of injustice that has yet to be resolved.

[Link >](#)

Evidence



Case Study: Offer to Return 27 Vigango; Offer to Return 30 Vigango.

In Kenya, the leadership of the National Museums of Kenya quickly learnt that barriers to restitution can be embedded within one's own national law and policy. When two American institutions offered to return 27 and 30 Vigango, respectively, they deaccessioned the funerary posts from their collections as artworks. Both institutions were advised that an import tax of over USD40,000 would need to be paid for the Vigango to be cleared by airport customs. This was in line with the Value Added Tax Act of 2013, which imposed a customs tax on materials

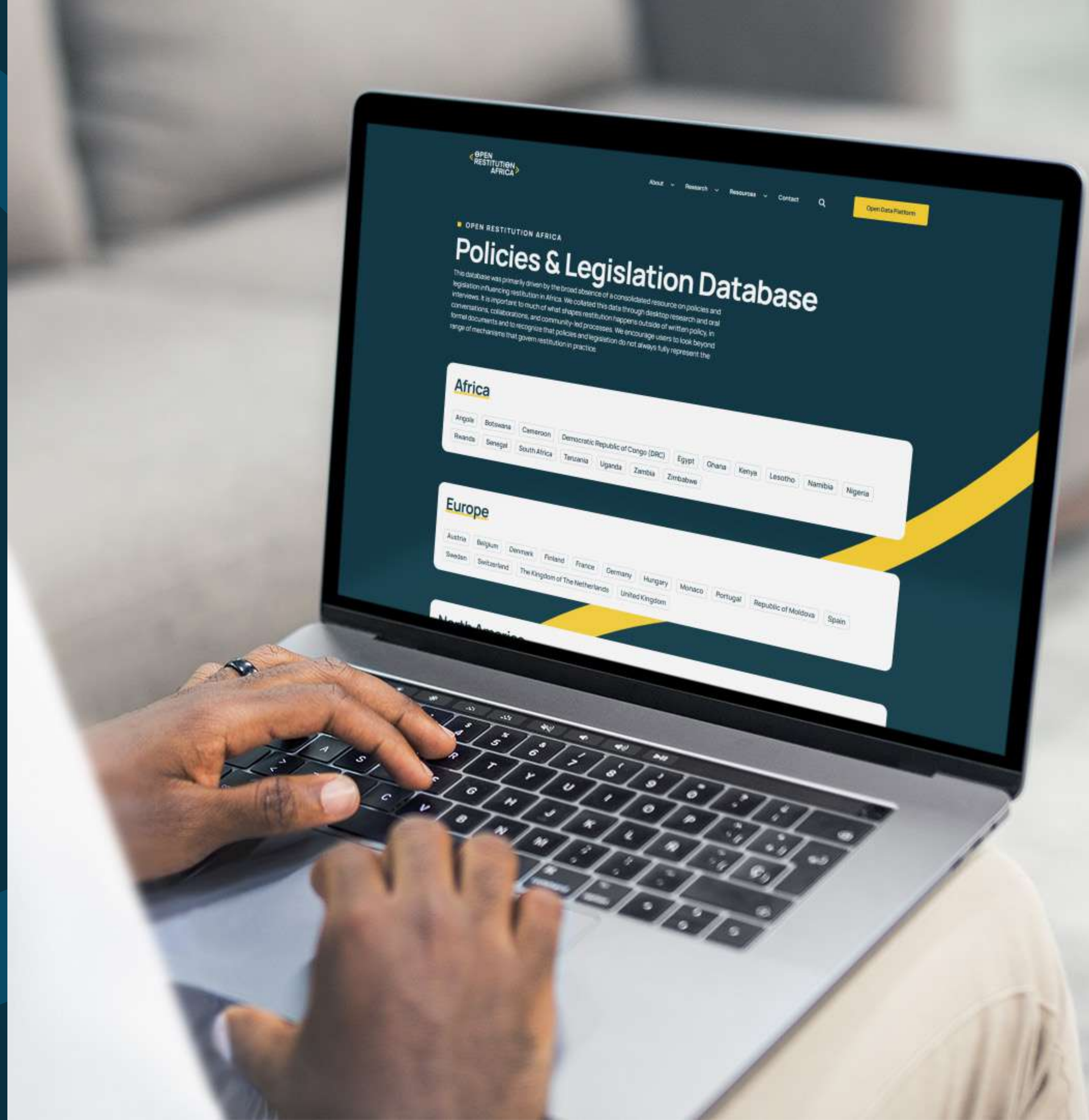
classified as 'artworks'. The 27 Vigango that were shipped without a budget for customs tax were impounded at the Jomo Kenyatta International Airport and subsequently reabsorbed into the illicit trade market. After multiple consultations, the leadership of the National Museums of Kenya was eventually able to circumvent this challenge by classifying the shipment of the 30 vigango as a special national project under the Finance Act of 2018 leading to a waiver in the tax previously assigned.

[27 Vigango >](#)

Tool:

Legislation & Policy database

This tool is a consolidated, open-access resource that brings together existing and developing restitution policies and legislative frameworks from across Africa, Europe, and North America. Developed by Open Restitution Africa through secondary research and oral accounts, it addresses the longstanding absence of a single, accessible reference point for practitioners, policymakers, and communities navigating the legal and policy dimensions of restitution work.

[Link >](#)



How to build equitable relations

Restitution is fundamentally relational; it requires trust, shared agency, and mutual respect across all levels. Strong relationships provide better avenues for alignment and stronger reintegration pathways that honour loss, grief, and repair.

“It is a marathon and not a sprint. Dialogue with nations and institutions in possession is key.”

- Dr Babatunde Adebisi

“The assumption that the state speaks for communities... [that] the state is perceived as the rightful owner... that way communities lose agency.”

- Goodman Gwasira

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Sector	Strategic action
Community-state relations	The fundamental shift required is from a state-led process that bypasses source/affected communities to a partnership model between the two parties. Trust through action: Trust between source communities and the state is built through tangible actions. Agency over custody: The goal is to restore community agency, not just to change the physical custody of an object from a foreign museum to a state-owned one. This can be done through: • Formalising co-decision-making • Establishing clear mediation roles • Creating joint governance structures • Starting with 'low-hanging fruit' to build trust • Developing community restitution charters • Bridging the gap through continuous engagement • Empowering communities with information and legal tools • Clearly delineating state and community responsibilities The February 2025 Management Agreement between the National Commission for Museums and Monuments (NCMM) in Nigeria and His Majesty Omo N'oba N'edo Uku Akpolokpolo Ewuare II, Oba of Benin illustrates effective collaboration between national repatriation bodies and communities. By distributing responsibilities for the maintenance and management of repatriated Benin belongings between both parties, it serves as a strong example of constructive community-state relations.

044

Sector	Strategic action
African state-African state (i.e., intra Africa relations)	A coordinated continental strategy: It is essential for African states to speak with a unified voice, pool knowledge and resources, and build collective bargaining power. Rather than responding reactively to the terms set by holding institutions, a coordinated approach enables African states to define their own restitution priorities, share proven strategies, harmonise legal and policy frameworks, and negotiate from a position of strength and shared purpose. From silos to synergy: Create an ecosystem where shared knowledge and strategy benefit all. Leveraging existing structures: Build on existing pan-African institutions, like the AU and regional economic communities, rather than creating entirely new, costly structures from scratch. Strengthening existing infrastructures involves • Harmonising legal and policy frameworks • Establishing continental data-sharing platforms • Developing a shared continental vision and strategy • Facilitating joint claims and collaborative research • Strengthening regional body mandates • Creating regional restitution platforms • Collaborating on border control and anti-trafficking • Speaking with a unified voice on the international stage

045

Sector	Strategic action
Global South-Global North relations	From recipients to partners: The fundamental shift is to move from relations characterised by power imbalances and historical legacies of violence to relations that are governed by equity and shared respect between all parties. Holistic redress goes beyond the physical return of belongings. It aims for a comprehensive model of reparatory justice, focusing on capacity-building and a fundamental rebalancing of power. To achieve this goal, the following strategies are essential when modeling South-North relations: • Assert African knowledge production: Prioritise indigenous scholarship and perspectives in the historical narrative. • Model community-led processes: Ensure that restitution is driven by the communities to whom the heritage belongs. • Demand full restitution: Move beyond temporary loans or returns toward legal and permanent ownership. • Negotiate mutual partnerships: Build equitable relationships that offer shared benefits rather than one-sided extraction. • Reclaim interpretive authority: Re-establish the right to interpret and reintegrate objects into their original cultural contexts. • Reform global institutions: Push for systemic policy changes within international museums and governing bodies.

Evidence



Case Study: The Return of the Rhodesian Cabinet Files to Zimbabwe from Rhodes University, South Africa.

The Repatriation of the Rhodesia Cabinet Files to Zimbabwe from South Africa was largely enabled by an existing regional network of archivists who met regularly and their shared commitment to repatriating migrated and dispersed archives. In 2010, following years of speculation, then President Robert Mugabe commissioned a report to determine whether the Ian Smith Papers, housed at Rhodes University, were personal in nature. The report found that more than 90% of the records contained in the collection were governmental in nature. The following year, at a joint sitting of the International Council of Archives

(ICA) and the East and Southern African Branch of the International Council on Archives (ESARBICA), the Director of Zimbabwe's National Archives shared these findings and called for the return of the collection, now dubbed "The Rhodesia Cabinet Files". South Africa's National Archivist who was in attendance immediately supported this call and subsequently arranged for an agreement to be reached between the Zimbabwean Government and Rhodes University. By 2012, the Rhodesia Cabinet Files had been returned to Zimbabwe

[Rhodesian Cabinet Files >](#)

Evidence

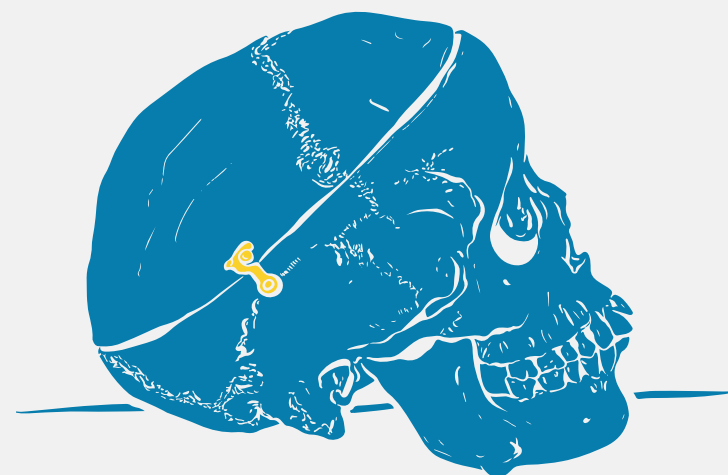


Case Study: Human Ancestors Return to Kilwa.

The rapid process of returning human ancestors from Kilwa to Tanzania from Kenya can be attributed to a unified understanding across all institutions involved that ancestral remains and belongings must be returned to their countries and communities of origin. Once the British Institute in Eastern Africa informally made contact with the National Museum of Tanzania, they digitally shared all the information they had via email, applied to the National Museums of Kenya for a permit to transfer the human ancestors, and used their surplus funding to

cover the costs of transportation. At the border, customs officials waived permits once a phone call from the National Museums of Tanzania confirmed that they would be receiving the ancestral remains. As a result, the core and complex work of identifying and reconnecting the human ancestors with their communities of origin began a mere 8 months after Tanzania discovered where the ancestral remains were being held.

[Link >](#)



Case Study: Bones of Returned Memory - The Repatriation of Neolithic Skeletons from Bordeaux to Rabat.

The return of Neolithic skeletal remains to Morocco from France in 2019 served two purposes; reconnecting Moroccans with remnants of their indigenous Amazigh culture and resetting a power imbalance in archaeological knowledge production. In 1984, when Morocco entered into an academic agreement with France, the skeletal remains were temporarily loaned to the University of Bordeaux to facilitate advanced scientific testing. This led to an over 30 year period of retention, and the development of a body of knowledge that excluded considerations around the skeletal

remains' links to indigenous knowledge systems and practices. When the collection of skeletal remains were returned to Morocco in 2019, they entered the custodianship of the National Institute of Archaeology and Heritage (INSAP); a space that has cultivated indigenised archaeological practices alongside scientific and technological advancements in the field since 1985. The new research agreements entered into with France ensures that the local cultural dimensions of archaeological work are embedded in all future knowledge production around the ancestral remains.

[Link >](#)

Appendix 1

Approaches to establishing sustainable funding



Appendix 1

Research funding and fellowships:

Global shifts in perception about colonial-era collections has resulted in a number of institutions rethinking and reframing the belongings, embodiments and human ancestors that they hold. This has led to a proliferation of provenance research projects, particularly in the Global North. While the focus is on critically reflecting on and re-presenting the narratives that accompany this material heritage, the resources provided can be stretched to do other work. For example, in Tanzania, two researchers’ participation in a provenance research fellowship programme in Germany also supported a pan-African consultative multi-stakeholder workshop. The workshop lay

the groundwork for Isanzu community members to initiate their restitution demands. It also prompted the government to commission a report that informs how a community’s needs can be centred in restitution processes, thereby enriching their policy and protocols for this work.

Case Studies: Isanzu Community Perspectives on Ancestral Human Remains Restitution to Tanzania.

[Link >](#)

Appendix 1

Cross-sector funding

050

The restitution of belongings, embodiments and human ancestors often intersects with other sectors’ needs and interests. Shared concerns can be leveraged to pool resources together for restitutionary work. In Zimbabwe, the return of the Rhodesia Cabinet Files - an archive of governmental records - was funded largely by the Office of the President and Ministry of Defense in Zimbabwe, given that the materials related to matters of governance in the face of economic sanctions, and national security. In Morocco, human ancestors were returned to the National Institute of Archaeology and Heritage’s (INSAP) osteothèque for preservation, further study and reintegration in Moroccan society. Their resources as a higher education and training institution, as well as an international collaborative research hub, have created an environment where Moroccans can begin to reconnect with indigenous Amazigh knowledge

and culture. At Open Restitution Africa, the development of an Africa-centred open data platform on restitution processes, has also enriched technological understanding around digital and AI tools, and their capacity to gather, interpret and communicate complex, multi-vocal datasets..

Case Studies: The Return of the Rhodesia Cabinet Files to Zimbabwe from Rhodes University, South Africa; Bones of Returned Memory; The Repatriation of Neolithic Skeletons from Bordeaux to Rabat

Rhodesian Cabinet Files >

Bones of Returned Memory >

Appendix 1

Surplus funding from NGOs working in Culture, History and Heritage

Restitution also intersects with the work of non-governmental organisations working in the fields of culture, history and heritage. These organisations are, at times inherited, or continue to receive resources as part of a network of organisations. Similarly to sectors with shared needs and interests, resources can be pooled together with these kinds of NGOs to enable work towards short and long term goals. In Tanzania, the physical return of human ancestors from Kilwa was financially supported by the British Institute in Eastern Africa’s

surplus budget for that year. With resources already available, both the Kenyan and Tanzanian officials responsible for restitution willingly fast-tracked the bureaucratic processes to ensure the human ancestors were returned to their country of origin.

Case Study: Human Ancestors Return to Kilwa

[Link >](#)

Appendix 1

Surplus funding from NGOs working in Culture, History and Heritage

Collaborative and co-operative projects across multiple regions, particularly within international professional bodies or with Global North institutions can also serve as a source of funding for restitutionary work, albeit temporarily. As such they are best modelled to direct funding to a targeted issue or objective. In Rwanda, the restitution of 4,095 sonic archives under the auspices of the SHARE project, was supported by three years of funding from the Belgian State. Rwandans are now in a position to access some of the content in these archives, but they are shared and in some ways still controlled by Belgium. In Zambia, the collaborative Shared Histories project between the Women’s History Museum of Zambia and National Museums for World Culture, Sweden was funded for three years by the Swedish Institute. Through the project, communities of origin

were able to establish ownership and digitally reconnect with their belongings. However the onus is still on the Zambian government to actively pursue physical return on a case-by-case basis if this is what is desired by the communities.

Change to Case Studies: Echoes of Return - The Restitution of Rwanda’s Colonial-Era Audio Archives (1950s - early 2000s); Redressing and Addressing the Lechwe Skin Cloaks of the Batwa People (1912 - 2025).

Echoes of Return >

Lechwe Skin Cloaks >

Each of these alternatives to government funding carries its own set of limitations in terms of gains, and an inevitable willingness to compromise. However, they can be explored and paired to alleviate the burden on African Ministries and governments that are at various stages of their restitution efforts.

Tool:

Open Data Platform

The Open Restitution Africa (ORA) platform is the first centralized open-access database specifically designed to track African cultural belongings and their restitution journeys. Built on principles of transparency and accessibility, ORA empowers researchers, communities, and advocates with comprehensive data about displaced cultural heritage.

[Link >](#)



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