

ual:

Archives, Museum and Special Collections

Data Protection Policy

Contents

1. Purpose
2. Our commitment
3. Personal data and archives
4. Approval
5. Version Control

1. Purpose

This document outlines UAL's Museum, Archives and Special Collections' commitment to process personal data in accordance with the General Data Protection Regulation (GDPR) and UK Data Protection Act 2018. We want to ensure that we treat your personal data with the same care and respect with which we treat our collections.

2. Our commitment

- Personal data will be processed fairly and lawfully. This means that all personal data collected from you or created will have a legal basis as described in GDPR. You will be informed of the legal basis and how we process your data in privacy information at the point or as close to the point of data collection.
- Data will only be obtained for a specified purpose and will not be used for any other purpose unless permitted or required by GDPR.
- We will process the minimum personal data and for this to be viewed as necessary by authorised persons in relation to the specific purpose.
- Personal data will not be kept longer than is needed for its intended purpose (with the exception of archive material – see below).
- Personal data will be processed in accordance with the rights of the individual over the personal data. These rights can be found within the privacy information links.
- Personal data which is kept permanently (for example loan agreements, copyright agreements and transfer of title forms) will be securely stored within UAL.

3. Personal data and archives

Personal data may be contained in our archive collection such as correspondence, staff records and student assessments.

UK data protection law recognises that there is a public interest in permitting the permanent preservation of personal data for the long-term benefit of society. In order to minimise any adverse impact on living individuals safeguards are applied, for example implementing technical organisational measures, identifying the minimum amount of personal data needed for archiving purposes.

Approved by the UAL Archives, Museum and Special Collections Advisory Board, October 2018

Our commitment to personal archival data:

- All newly acquired archive material will be risk assessed to ascertain whether it includes personal data, especially special categories of personal data covered by UK data protection legislation.
- Serious consideration will be given to the permanent preservation of personal data and how far this will be in the public interest. This consideration is documented to support our accountability requirement.
- Personal data may be published in searchable online catalogues.
- Sensitive personal data or data that might cause the data subject distress will not generally be made available to researchers whilst the individuals represented in the data are living.
- Where data subjects are assumed to be living, staff will provide copies of associated records with the personal information redacted or answer queries by assessing the documents themselves.
- Where researchers can make a robust argument for consulting records that contain personal information about data subjects that are still alive, this data will be shared under an appropriate data sharing/processing agreement or documented instruction.
- Where it is not known whether an adult data subject is still living, a lifespan of 100 years will be assumed, with an assumed age of 13 at the time of record creation. Archives containing personal information will therefore remain closed until 87 years have passed since the record was created.
- UAL as a public authority is subject to the Freedom of Information Act 2000 and Environment Information Regulations 2004. Right of access to information under these laws should be sent to foi@arts.ac.uk
- Where data held by us is seen by the data subject to be incomplete/inaccurate, depending on the purpose for processing we may make rectification through the provision of supplementary statements, without damaging the integrity of the original data. Requests should be sent to dpo@arts.ac.uk

- If you engage your right to have your personal data deleted and depending on the purpose for processing we will give due consideration to all requests to have data removed from public view. Requests should be sent to dpo@arts.ac.uk

4. Approval

Proposed by Judy Willcocks (Head of CSM Museum) and approved by Archives, Museums and Special Collections Advisory Board October 2018

5. Version Control

Revised by Information Governance and Sarah Mahurter (Manager, ASCC) approved by Archives, Museums and Special Collections Advisory Board [18 May 2021]