

## Museum & Study Collection

### Data Protection Policy

This policy document outlines the Museum & Study Collection's commitment to collect and process personal data in accordance with UK and European regulations. We want to ensure that we treat the personal data we hold with the same care and respect with which we treat our buildings and collections. The Museum & Study Collection uses all reasonable endeavours to comply with the Data Protection Act (1998) and the General Data Protection Regulations (2016).

#### Our commitment:

- Personal data will be processed fairly and lawfully. This means that individuals will not be deceived or misled into supplying information.
- Data will only be obtained for a specified purpose and will not be used for any other purpose unless permission is given by the data owner.
- Personal data will be adequate, relevant and not excessive in relation to its 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 which the information concerns.
- Personal data which is kept permanently (for example loan agreements, copyright agreements and transfer of title forms) will be securely stored and will not be used by the Museum for any other purposes other than that which was originally intended.

#### Personal data and archives

The Museum & Study Collection does not set out to collect personal records. However the Museum's archive does contain some historical documents, such as correspondence, staff records and student assessments which contain personal data.

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. However, safeguards which minimise any adverse impact on living individuals must be applied.

## **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.
- No personal data will be published in the Museum & Study Collection's searchable online catalogue.
- 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 still known or believed to be alive.
- Where data subjects are assumed to be living, Museum & Study Collection 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, they will be informed that they are responsible under the Data Protection Act for any processing by them of personal data disclosed to them, including publishing.
- 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 16 at the time of record creation. Archives containing sensitive personal information will therefore remain closed until 84 years have passed since the record was created.
- The Museum & Study Collection will respond to all Freedom of Information requests in a timely manner.
- Where data held by the Museum & Study Collection is seen by the data subject to be incomplete, the Museum & Study Collection will make rectification through the provision of supplementary statements, without damaging the integrity of the original data.
- Under UK data protection law individuals have the right to have personal data erased – also known as the 'right to be forgotten'. While this right is not absolute, the Museum & Study Collection will give due consideration to all requests to have data removed from public view, especially where an individual's rights or entitlements are at stake.

<b>Date approved by College Executive Board</b>	<b>July 2019</b>
<b>Date for next review</b>	<b>July 2022</b>