

Personal Data held within the Archives

About us

The Planned Environment Therapy Archives and Special Collections support the Mulberry Bush Organisation's mission to meet the needs of emotionally troubled and traumatised children, young people, their families and communities.

We do this by preserving and making accessible the records of the organisations and individuals deposited with us in order to support research, teaching and learning.

We acquire and manage archive collections relating to the criteria described in our *Collections Development Policy*.

The collections held by the Planned Environment Therapy Archives and Special Collections have been chosen for permanent preservation in order to maintain the historical record of the organisations and people featured within them, and because of their enduring value for education and research. The personal data within these collections is held in accordance with the safeguards and exemptions laid out in UK Data Protection legislation for archiving purposes in the public interest.

Alongside the collections, personal data may also be held in the form of:

- collections metadata which enables the management of the data
- catalogue entries, finding aids and biographical information which enable understanding of and access to the archive collections.

The collections are held distinct from the administrative records of the Planned Environment Therapy Archives and Special Collections. Please refer to the *Privacy Notice for Service Users* for how we handle your data if you use any of our services or

give material to the Archives and Special Collections.

The data controller processing your data is the Mulberry Bush Organisation. We are registered as a data controller with the Information Commissioner's Office (our notification number is Z472183X) and we are committed to ensuring that the personal data we process is handled in accordance with data protection legislation.

How we collect the data

Material for inclusion within the Archives and Special Collections is selected based on the *Collections Development Policy*. Only material assessed to have enduring value for education and research is retained permanently.

With the exception of the Organisation's institutional archive which is acquired by internal transfer, materials collected under the *Collections Development Policy* are received from external organisations and private individuals. The transfer is governed by gift or loan deposit agreements.

Prior to receipt of material from external depositors, the potential presence of personal data is noted. Material is accessioned on receipt and the presence of personal data is confirmed. During cataloguing all material is appraised to ensure only records of enduring value are retained.

We also hold personal data in material received prior to the introduction of the procedures outlined above, and which has not yet been catalogued. During cataloguing, any personal data will be assessed in light of relevant collection policies and processes to ensure it is held in line with the current legislation.

Why we process the data

We acquire and manage the archive collections in order that there might be a permanent record of the organisations and people featured within them. These collections support research of all kinds, including academic, genealogical, and personal interest. They support:

- learning and study
- provide evidence of past actions and decisions
- support long term accountability and transparency.

In order to ensure the Archives are available for these purposes, we carry out the following activities:

- Acquisition and selection
- Arrangement
- Documentation and cataloguing
- Storage and repackaging,
- Preservation and conservation work (including format shifting and data migration)

We manage the collections in accordance with international and national professional standards, good practice and relevant legislation (for example the Freedom of Information Act, copyright legislation).

Personal data within the Archives is processed in accordance with UK Data Protection legislation and the safeguards and derogations relevant to processing for archiving purposes in the public interest, and with specific reference to The National Archives' Guide to Archiving Personal Data.

Our legal basis for holding the personal data which appears in the Archives is for the performance of a task in the public interest.

Access and Security

All the archive collections within our care are held within managed, secure and environmentally-monitored storage areas in accordance with documented procedures and taking into account current best practice. Digital records are held on the Organisation's servers, on Amazon S3 cloud storage, or on moveable media which is held in the secure storage areas.

We provide access to the collections via an onsite searchroom, an online enquiry service, a paid for reprographics service and outreach activities. A small but growing proportion of materials are also available online.

Details of our holdings are available on request.

We retain records with a view to future as well as immediate access. Not all of the archive collections are accessible immediately and decisions regarding release of personal data are based around whether the use would be fair to the data subjects involved and to ensure that any adverse impact is minimised.

Records containing special category data are closed until all people involved are judged to be over 100 years old. Records containing other personal data are subject to a risk assessment and not released until the potential for impact on individuals is low or non-existent.

Where material is made available in the search room, researchers are required to sign an agreement confirming that they will act in accordance with UK Data Protection legislation with regard to any personal data to which they are given.

Digital copies of archive collections are reviewed before being made available on the internet to ensure that any adverse impact on living individuals is minimised.

Applicable rights and access requests

Your rights regarding any personal data held about you within the archive collections are different to those regarding the administrative data we hold about you. This is where that right would prevent or seriously impair the purpose of holding the archive collections (ie to provide an accurate historical record).

Right to be informed: this Privacy Statement informs you about the manner in which we hold and process personal data in the Archives.

Access: If you believe we hold personal data about you in the Archives and would like to

access this, please contact archives@mulberrybush.org.uk to make a subject access request.

Rectification: If you believe that the personal data we hold about you in the Archives is inaccurate, please let us know. Whilst we would not be able to alter an actual document, as this forms part of the historical record, we will consider amending the catalogue record with your corrections.

Erasure: If you would like to have your personal data redacted from archival material, please contact us so that we can review the material. In the first instance we would look at reclosure of the material(s).

Contact

If you have further questions please contact: archive@mulberrybush.org.uk

| Reviewed on | Version | Author(s) |
|--------------------|----------------|---------------------------------|
| 30/1/2020 | 1.0 | Nicky Hilton, Senior Archivist |
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