

SOP Title Reference: **Archives & Special Collections
Access Policy**

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Information Services Policies and Procedures

ARCHIVES & SPECIAL COLLECTIONS ACCESS POLICY

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1. Introduction

St George's Archives and Special Collections (hereafter the "Archive") collects, preserves and makes accessible unique materials documenting the history, functions and development of St George's, University of London (hereafter "SGUL" or the "University"). The Archive also aims to make accessible the history of St George's Hospital which has a closely shared history with SGUL. Although the majority of Hospital records have been deposited at the London Metropolitan Archives, an important series of records remain at SGUL.

1.1 Mission Statement

The Archive collection supports the teaching and research activities of SGUL, and enables research and learning by individuals external to the University. The Archive's activities are informed by the University's strategy, focusing on providing excellent information and learning resources that enhance knowledge, inspire education, and promote the work and achievements of the University.

2. Scope of Policy

The purpose of this policy is to define the rules and regulations regarding access to the Archive collection.

3. Procedures

Archive staff will ensure the collections are accessible to users in a safe and secure way, following as closely as possible the guidelines issued by The National Archives. These guidelines have been created for information professionals and are available via The National Archives website.

The University aims to promote access to our collections internally and externally. Access is free of charge and by advance appointment only, within Archive visiting hours. Visiting hours are 9.30am- 4.30pm Monday to Thursday. There are occasions when the Archive service will be unavailable due to limited staff resources, so appointments are necessary.

On their first visit, readers will be asked to complete a reader registration form. They will also be required to show one form of suitable photographic ID, for example a valid driving license or passport, a photo student card, or SGUL staff card (for internal users).

Users will be supervised by the Archivist at all times and will be required to read the handling guidelines prior to consultation of materials. All users should be considerate of the collections, staff and research environment, and adhere to the rules governing access provided on the reader registration form and handling guidelines.

The following guidelines on access to the material are in place to ensure the continued security, preservation and availability of these unique and irreplaceable collections.

4. Storage, Collection Care and Preservation

Archives and special collections are held on closed access in specified areas, for reasons of security and preservation. They are not available for loan to students or staff.

All storage conditions for archives and special collections should comply as closely as possible with the following standards:

European Standard EN 16893:2018 Conservation of Cultural Heritage. Specifications for location, construction and modification of buildings or rooms intended for the storage or use of heritage collections

British Standard BS 4971:2017 Conservation & Care of Archive & Library Collections

5. Enquiries

The Archivist will attempt to respond to all enquiries whether by post, email or telephone. The Archivist will aim to respond to enquiries within 2 weeks from the date of receipt. Where this is not possible, the Archivist will acknowledge the enquiry and make recommendations if the information can be sought elsewhere.

The Archivist will not undertake detailed research on behalf of enquirers but will look into available sources to determine whether a personal visit for research is warranted to allow enquirers to carry out their own research.

In the event that a researcher cannot visit in person, we will recommend they contact an independent researcher. A list of independent researchers is available via the National Archives.

6. Records Closure and Restriction Periods

Access to the collections is as open as possible, however, some restrictions on access are inevitable due to the nature, content or physical condition of the material.

Access to the collections is subject to certain statutory or legal requirements, notably data protection legislation, freedom of information legislation, and copyright legislation. Where there are restrictions, users are provided with an explanation and guidance on access procedures, if appropriate.

From time to time, it may also be necessary to place restrictions on access to some archives and collections for the purposes of collection care and management.

Access restrictions may be based on the following:

6.1 Confidentiality: Archive material which contains personal or sensitive information relating to living individuals is not normally available for consultation and in such cases the provisions laid out in data protection legislation will be implemented. Also see section 7. Exemptions Under Data Protection Legislation.

6.2 Depositors' Rights: where there is an existing agreement between the depositor of a collection and SGUL restricting access for a specific period of time, that information will be recorded in the catalogue and accessions spreadsheet. Restrictions may also apply solely to copying and publishing material.

6.3 Copyright: information derived from the collections and copies supplied must be used in accordance with current copyright legislation. If a researcher wishes to reproduce an item held within the archive collection within their work, permission must be obtained from the copyright holder. In some cases the copyright holder will not be SGUL. SGUL does not provide clearance for the intellectual property rights of any third party, nor does SGUL provide legal advice in regards to intellectual property rights. Responsibility for obtaining permission from the copyright holder rests solely with the researcher.

The reproduction of items from the University archive collection must be fully credited as specified by the Archivist.

6.4 Physical Condition: access to any part of a collection may be restricted if it is considered by Archives staff to be fragile or physically unfit to be handled safely. The decision to refuse access on the grounds of preservation purposes is made at the discretion of the Archivist. To minimise wear and tear on original documents and help preserve them for future generations, surrogates or alternative formats may be produced in preference to the original.

6.5 Business Sensitivity: Certain University records are closed for a period following their creation. Researchers are entitled to apply for access to such material under the terms of freedom of information legislation by submitting a request to the SGUL Governance Manager. Requests can be emailed via the freedom of information mailbox: foi@sgul.ac.uk.

6.6 Uncatalogued Material: The Archive reserves the right to withhold access to any parts of the collection which are unlisted and/or inadequately arranged and where access might affect the original order and integrity of that collection. Access to uncatalogued material may also be restricted due to the staff time required to find the requested information.

6.7 Closure Periods: A closure period is where access to an item is withheld for a pre-defined period of time due to the sensitive nature of its content. Records identified as closed will be marked as such within the archive catalogue and finding aids.

If a document contains personal data about an individual, particularly of a sensitive nature, it will be closed for a period of up to 100 years. However the rights of an individual under the DPA end with death. If it is not known whether a data subject is alive or dead, the following working assumptions should be used, as stated in The National Archives 'Guide to archiving personal data' (August 2018):

- Assume a lifespan of 100 years
- If the age of an adult data subject is not known, assume that he was 16 at the time of the records
- If the age of a child data subject is not known, assume he was less than 1 at the time of the records

Serious researchers may apply for early access to closed records, by submitting a written request to the Archivist. For further information see section 7. Exemptions Under Data Protection Legislation.

Closed records are accessible to only the following roles for the purposes of administering the collections and answering freedom of information and data protection requests:

Archivist
Records Manager
Data Protection Officer
Governance Manager (Fol)
Information Governance Manager
Head of the Library and Learning Services

7. Exemptions Under Data Protection Legislation

Archive material which contains personal or sensitive information relating to living individuals is not normally available for consultation under data protection legislation. However, exemptions from data protection legislation exist which allow processing of data, in the form of research and archiving in the public interest, to be undertaken for historical and statistical purposes or where public interest can be proved.

Requests to gain access to personal data in the Archive will need to be checked against the exemptions listed in data protection legislation and the guidelines and advice available. Most requests should come under the 'research and statistics' exemption detailed in data protection legislation, which includes scientific or historical research purposes, or statistical purposes. This research must observe the 'relevant conditions':

- the personal data is processed subject to appropriate safeguards for the rights and freedoms of data subjects, and

- the results of the research or any resulting statistics are not made available in a form which identifies a data subject.

Research exemption requests should be made in writing and addressed to the Archivist. Applications are reviewed on a case by case basis and may lead to consultation with the SGUL Data Protection Officer.

8. Data Subject Access Requests

Under data protection legislation individuals have a right to see personal information held about them. If the information is not readily accessible to individuals due to record closures, a copy or transcription of the information will be provided by a member of staff. Data subject access requests should be directed to the SGUL Data Protection Officer in writing either via dataprotection@sgul.ac.uk or by post if preferred.

9. Reproductions

Any reproductions made from materials in the Archives & Special Collections will be done so in line with copyright regulations.

Photocopying or scanning of original documents may be undertaken by the Archivist at their discretion. The Archivist reserves the right to refuse any copying request. Copies are supplied for the purposes of research for a non-commercial purpose or private study and must not be sold, circulated or recopied by users. Charges may be incurred.

Visitors are welcome to take their own photographs, provided they complete the Archives Self-Service Photography Form, and do not use flash for preservation reasons.

Where suitable the Archivist may arrange for materials to be photographed in the St George's photography studio. This will likely incur a charge.

10. Loans

The Archive will consider loan requests from institutions able to satisfy all the relevant terms and conditions highlighted in the 'Loan of Archive Items for Exhibition' document.

11. Outreach and Promotion

The Archive is committed to making its collections accessible free of charge to local and regional communities, and to as wide a range of new audiences as possible. The Archive aims to achieve this through a programme of public talks and events, blog posts and social media updates, exhibitions, and organised on-site sessions with external groups and SGUL students and staff.

12. Policy Review Procedure

This policy will be reviewed annually by the Archivist to ensure that it meets the University's operational and legal requirements.

Document Information	
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Related policies	<p>Archives and Special Collections Policy</p> <p>Archives and Special Collections Collection Development Policy</p> <p>Loan of Archive Items for Exhibition: Terms and Conditions</p> <p>Records Management Policy</p> <p>Retention and Disposal Policy</p> <p>Subject Access Request Form</p> <p>Data Protection Policy</p> <p>Digital Preservation Policy</p>

Document History		
Version	Date	Summary of change
1	16/04/2018	Policy created and approved.
2	04/09/2019	<p>Policy reviewed.</p> <p>Added sub-heading '1.1 Mission Statement' within the introduction section.</p> <p>Updated all 'Data Protection Act (1998)' references to 'data protection legislation'.</p> <p>Updated all 'Freedom of Information Act (2000)' references to 'freedom of information legislation'.</p> <p>Section 3- Added additional sentence regarding guidelines available via The National Archives website. Added Archive visiting hours.</p> <p>Section 6.5- Added foi mailbox address</p> <p>Section 6.7- Replaced old code of practice for archivists and records managers with The National Archives 'Guide to archiving personal data' (August 2018).</p>

		<p>Section 7- Updated to include 'archiving in the public interest', 'research and statistics' exemption and relevant conditions as detailed in DPA (2018).</p> <p>Added Digital Preservation Policy to list of related policies.</p>
2	07/10/2019	Changes approved by Information Governance Steering Group (IGSG).