

# Archive Collection Policy

<b>Policy number</b>	BS045
<b>Applies to</b>	Whole School
<b>Endorsed by</b>	Bursar
<b>Responsibility</b>	Bursar
<b>Date reviewed</b>	September 2018
<b>Next review</b>	March 2021

## Archive Collection Policy

The Bedford School Archive is a collection of documents, photographs, books, paintings, and memorabilia dating back to the Nineteenth Century. The School Library team is responsible for the central archive collection and the main aim is to preserve and conserve the existing archive and to ensure that current and future items are added to the archive collection. The collection also includes the school journal, The Ousel, first published in 1876, available online on the Bedford School Heritage sites. The school archive is not inclusive and memorabilia is all round the school including Boarding Houses, The Old Bedfordians Club, The Pavilion and other sports area, The Memorial Hall, The Chapel, and many other areas. Some, but not all, are catalogued.

### Access

The main collection is catalogued and there is a dedicated School Archives page on Firefly, the school VLE, with links to the archive catalogue and the Bedford School Heritage sites. Digital archives are currently stored on the M Drive on the school network. Information may be subject to copyright, the new data protection bill and GDPR (The General Data Protection Regulation). We have a responsibility to maintain confidentiality where necessary and to restrict access if need be.

### GDPR and Article 89 (Appendix 1)

This allows us to store and maintain archive collections with "Safeguards and derogations relating to **processing for archiving purposes in the public interest**, scientific or historical research purposes or statistical purposes."

With the exception of purpose limitation and storage the basic principles of GDPR should be applied to all new and existing archive material. (Appendix 2)

### School Records

Pupil and academic staff records are stored in the Admin Offices and are subject to review under GDPR. This is not currently within the remit of the school archive but if they are transferred and designated archive material under Article 89 they become exempt from GDPR. The school archive does have old school lists, class lists and miscellaneous staff information. There is also information on existing and previous Head Masters and individual Old Bedfordians. These may consist of documents, correspondence, material collected from periodicals and/or material sent to the school by Old Bedfordians and other donors. These should be stored securely until they can be subject to data minimisation.

## Digital Archives

Digital documents are on the M Drive on the school network. There is also a link to some of the documents and photographs held by the OB Club.

SDS host the Bedford School Heritage sites and provide the following:

**Bedford School Research website** contains all confidential information including the school registers, school and which OB registers. Access to this is via the Archives site on Firefly and is restricted.

**Bedford School Heritage website** includes school history, OB Review, photographs, ousel calendars, school magazines, The Ousel and the world wars. Access is via the Archives site for the school community. The OB Club manage access for OB subscribers and visitors.

## Collection Policy

The collection is being catalogued to improve access to the existing archive and we will continue to add to it with a variety of different materials, both physical and digital. The Ousel provides an invaluable summary of all aspects of daily school life and our aim is to establish a framework so that we can continue to do this with regular information, events, news and memorabilia from many areas in the school. We need to be clear about the purpose of storing the material, ensure it is relevant and provide details of the source.

## Donations

Donations are always welcome but we need to ensure that they conform to our collection policy and belong in the archive. There may be capacity issues because of the limited space in the current archive. Duplicates should be kept to a minimum, particularly with school documents like school magazines, programmes, and books. However, if they are signed or annotated and/or part of a collection they should be catalogued accordingly and collections kept together. Large collections cannot easily be accommodated and should be discussed with Bedford School Association and the Head Master.

### Archive material may include:

- Reports and photographic records, both print and digital, of regular school events in sport, drama, music, art, extra curricula and academia.
- Reports and documents, both print and digital, relating to special or unexpected events during the school year.
- Speech Day (US and Prep School) speeches: HM and Head of School.
- Books, school publications, prospectus, magazines etc. both in print and digital format.
- Memorabilia such as new scarves, caps, colours and ties.
- Historical school memorabilia.

- Cups and Trophies.
- Old Bedfordian events and information.

#### Sources:

- The school website: information about news and events.
- Newsletters, External Affairs and marketing.
- Newspapers and magazines.
- School departments including music, theatre and sport.
- Prep School.
- Old Bedfordians.
- Donations.

#### Physical Archives

The existing archive is located in no. 6 Burnaby Road. These three rooms have been refurbished to ensure that the collection is kept in the best possible condition and it will be stored in the most effective way to ensure preservation. One of the rooms may be designated a secure area and kept locked to restrict access.

- Paintings and pictures are stored vertically in purpose built shelving.
- All the documents are stored in flat conservation boxes, or similar.
- Books will be cleaned and repaired if necessary.
- Photograph collections are kept flat in conservation boxes with inner plastic wallets where appropriate. All information and data is recorded on the back of photos using soft pencils.
- Single Ousels will be kept as original source data and stored in flat conservation boxes. Bound copies of the Ousels will be kept, particularly when there are appendices which may not have been in the original Ousels. These include class lists and war honours.
- Old AV material such as film, discs and cassettes are digitised where possible.
- Memorabilia will be stored in appropriate boxes to ensure safety and preservation.
- Newspapers and large documents will be stored flat in conservation boxes. Some newspaper articles are digitised and stored as PDF documents.
- Plans to be kept in plan chest and conservation boxes as appropriate.

#### Digital Archives

Many current and future archives are digital. These are stored a central site on the school network. Metadata is essential and, where possible, there will be direct links with the Archive database. The metadata should include dates, names and event details. If necessary print copies are as a back-up for important documents. Digital archives may include:

- Photographs and documents
- Newsletters

- Correspondence
- Media files
- Newspaper cuttings
- Documents and Images
  - Some documents and photos are digitised and stored as PDFs. The the whole photograph collection may be digitised in the future.
- Registers and class Lists
  - Available on the Bedford School Heritage Research site with limited access. Recent school lists are available using a dedicated ISAMS report.
- The Ousel
  - The complete set of Ousels is available in digital format, dating back to 1876 to the current day. The Old series started in 1876 and the New Series launched in 1896. Originally published every 2 weeks, this eventually became termly, and now published once a year. Digital access is via the Bedford School Heritage sites.

## Appendix 1

### Article 89

- This allows us to store and maintain archive collections with “Safeguards and derogations relating to **processing for archiving purposes in the public interest**, scientific or historical research purposes or statistical purposes.” (APIPI) <http://www.privacy-regulation.eu/en/article-89-safeguards-and-derogations-relating-to-processing-for-archiving-purposes-the-public-interest-scientific-or-hi-GDPR.htm>

### Processing for APIPI

- Lawful processing – There is an (EU) expectation that archive services are supported by a formal legal obligation but in the UK this is often not the case. However, Ministers, DCMS and ICO agree in principle that archive services should continue. House of Commons Written Answer specified this and should provide legal basis
- <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2017-11-03/111381/>
- “We recognise the importance of the permanent preservation of archives for long-term public benefit by museums, galleries, archives and libraries. The General Data Protection Regulation (GDPR) and the Data Protection Bill permit such organisations to process personal data (including sensitive personal data) without consent, where necessary for “archiving purposes in the public interest”, subject to appropriate safeguards for the rights and freedoms of data subjects. It also exempts archiving services from complying with certain rights of data subjects (for example, rights to access, rectify or erase their data), where the exercise of such rights would seriously impair or prevent them from fulfilling their objectives.
- ‘Archiving in the public interest’ is a new term in data protection law. The Data Protection Act 1998 made no express reference to it and it is not defined in the GDPR, but Recital 158 to the GDPR may help to understand it. It says:

- “Public authorities or public or private bodies that hold records of public interest should be services which, pursuant to Union or Member State law, have a legal obligation to acquire, preserve, appraise, arrange, describe, communicate, promote, disseminate and provide access to records of enduring public value for general public interest.” (3/11/17)

## Appendix 2

### Applying The Basic Principles to Archives (article 5)

#### Lawfulness, fairness and transparency

- Our lawful basis is **‘necessary for archiving purposes in the public interest (APIPI), subject to safeguards ‘** (Article 89)
- We show fairness in archiving by demonstrating that preserving personal data is necessary through APIPI, and ensuring records are correct and accessible if appropriate.
- To demonstrate transparency, we should catalogue material fully and accurately showing source, purpose and location and provide details about the management of the archive.
  - Who we are, where we are, why we have an archive, what we do, and how we provide access.

#### Purpose Limitation

- Archives are exempt where the further purposes are compatible with the original purposes, e.g. APIPI or research, or there is consent to the incompatible further purposes, e.g. marketing.

#### Data Minimisation

- Ensure that there is a clear collecting policy and criteria and that material is relevant to the school archive.

#### Accuracy

- By definition, archives are not up to date and we cannot guarantee accuracy; if they are incomplete, that is part of the story they tell. New, corrected material may have to be added and documented alongside the original material.

#### Storage Limitation

- Archives are exempt and retention is permitted if data is being processed only for APIPI; there should still be appropriate measures to protect the rights and freedoms of the data subjects.
- Integrity and Confidentiality

- Secure handling and storage of data, protecting information with a closed access policy if necessary.
- Clear protocols to prevent unauthorised access and a clear procedure for authorised access for research purpose.
- Measures to prevent accidental loss, damage or destruction.

### **Accountability**

- Document everything we do – queries, correspondence, emails, requests etc.
- Keep the archive catalogue and digital archive up to date where possible.
- The school needs be aware of all archive material held in the school showing a clear line of responsibility in each area.
  - The Library staff are responsible for the school archives held in No. 6 Burnaby Road, the digital archive (M Drive), The Bedford School Heritage websites (SDS, the archive catalogue (Autolib), the Library and the Memorial Hall.
  - Other area not within the scope of the Library include:  
The OB Club, Recreation Centre, Chapel, Music School, Theatre, Pavilion, Prep School etc.