



ACCESS TO INFORMATION PROCEDURE

Science Museum Group, 2024

Version 4

Approved Date: 2024-10-07

Review Date: on or before 2029-10-06

REQUESTS FOR INFORMATION

Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2000 (EIR) (together the "Acts")

Requests for Information

1. Requests in writing, from any person, seeking information held by SMG will be treated as FOIA or EIR requests (as appropriate). For the avoidance of doubt, a request need not refer to the FOIA or EIR.
2. All requests are logged at the point of receipt.
3. Where a request is unclear or otherwise needing further information, a request for clarification will be sent to the requester.
4. A response will be sent at the earliest possible opportunity within the 20 working days specified in the Acts. Where a request for clarification has been made the clock on the time limit will be paused until a response to the request for clarification has been received.
5. Information will be collated, reviewed and redacted appropriately under the terms of the Acts. SMG will rely on exemptions where appropriate to withhold information but only in circumstances where it is deemed necessary to protect the interests of the public, SMG, interested third parties (where appropriate) and/or the public sector in general.
6. Draft responses will be prepared by the Corporate Information Team in consultation with Information Asset Owners and the responsible Executive Member(s).
7. The Qualified Person has been determined to be the Director and Chief Executive. The Qualified Person's opinion will be sought prior to the application of the exemption contained in s.36 FOIA (Prejudice to the Effective Conduct of Public Affairs).
8. All responses will provide details of the complaints procedure for challenging the withholding of information or other aspects of the handling of the request.

Complaints/Internal Reviews

1. Requests for Internal Reviews should be made in writing and addressed to the Group Data Protection Officer. Preferably by email to freedomofinformation@sciencemuseum.ac.uk or by post to Head of Corporate Information, Science Museum Group, National Science and Media Museum, Pictureville, Bradford BD1 1NQ.
2. Internal Reviews will be handled by a member of the SMG Executive who was not party to the discussion(s) and/or decision(s) surrounding the request under review.
3. Such review will be managed independently and thoroughly and a response will be sent within 40 working days (in exceptional circumstances, additional time may be taken) in accordance with the guidance of the Information Commissioner's Office.

Data Subject Access Requests under the General Data Protection Regulation ("UK GDPR")

1. Article 15 of the UK GDPR gives individuals various rights over their Personal Data. These include the right to be informed whether their information is being processed by SMG and to be provided with detail of:
 - a. the purposes of the processing
 - b. the categories of Personal Data concerned
 - c. the recipients of the data where it has/will be disclosed
 - d. the envisaged period for which the data will be held (and the criteria used to determine that period)
 - e. the source of the information held
 - f. the existence of any automated decision making or profiling
 - g. the safeguards in place for any data transferred to another jurisdiction or to an international organisation

Data Subjects may also:

- h. request that information be corrected (where necessary) or erased and may restrict (or object to) processing
- i. lodge complaints with the Information Commissioner's Office
- j. request detail as to the source of the information
- k. request a copy of the Personal Data undergoing processing

(a-k above together "Data Subject Rights Requests").

A Data Subject Rights Request may be made verbally or in writing. All Data Subject Rights Requests received by SMG should be sent to data.protection@sciencemuseum.ac.uk for processing.

2. Requests will be responded to within one month in accordance with the UK GDPR.
3. No charge will be made for a single copy of Personal Data provided in response to a SAR. Where further copies are requested SMG reserves the right to charge a reasonable fee based on the administrative costs.
4. Where a SAR is deemed 'manifestly unfounded or excessive' (Art 12(5) UK GDPR) SMG reserves the right to refuse the request.
5. Information will be redacted (or omitted) from any information released where it would constitute the Personal Data (as defined in the UK GDPR) of an individual who is not the Data Subject making the request or one of the special categories of Personal Data (defined in Art 9 UK GDPR) of an individual who is not the Data Subject making the request.
6. Information which is beyond the scope of the SAR or is exempt under the UK GDPR will be excluded from the response to the SAR by omission or redaction.
7. Where the requester's data is mixed with other third party data (e.g. in CCTV footage) a balancing test will be carried out in which the needs of the Data Subject

will be weighed against the rights of the other individuals to have their Personal Data protected.

8. If consent for holding data is withdrawn, or if a complaint is made, this will be recorded for reference.

Access to Physical Files

1. Access for Visiting Researchers:
 - a. Visiting Researchers may request to see files via the library and archives service.
 - b. Files should be checked by the Corporate Information team for sensitive information.
 - c. Visiting Researchers should sign the Data Protection waiver form prior to viewing a file. A new form should be signed on each visit.
 - d. Visiting Researchers will be subject to the regulations of each Museum's archive and library facility.
 - e. Visiting Researchers may request up to six files to consult during an appointment. Any requests for additional files will only be processed if resourcing allows. Advance notice should be given for requests for material.
2. Access to Files for SMG Employees/Volunteers:
 - a. Legacy restrictions on access to files will be assessed on a case-by-case basis as to whether such restrictions still apply. If restricted access is deemed necessary, files shall be restricted to a role or team and not to an individual.
 - b. Files will be delivered directly to or collected by the individual requesting access or made available in an SMG reading room space.
3. Transporting Files Between SMG Sites:
 - a. The transportation of files between SMG sites should be avoided. Where practicable, individuals wishing to view a file should travel to the file's home location..
 - b. A digital surrogate will be provided by the Corporate Information Team where appropriate. At the point of digitisation, the Corporate Information team will determine whether the paper file should be retained or destroyed in accordance with the Information Management Policy.