

## **Her Salisbury Story policy document**

The aim of this document is to provide guidance for volunteers and team members of the Her Salisbury Story project to ensure the privacy and security of personal information and the safeguarding of any person who is involved with the project. All who take part in the project will be required to adhere to the contents of this document.

### **1) Data Protection**

#### a) Data protection legislation

By its nature, the project includes the collection and storage of personal data. Personal data is any information that allows a living individual to be identified directly or in combination with other information. Examples of personal data are names, addresses, contact information and other information relating to individuals, as well as characteristics such as gender, ethnicity, language, nationality, and country of birth. All personal data should be processed in accordance with the UK data protection legislation. Further details can be found at the [Information Commissioner's website](#).

Because this project includes archiving of oral history interviews, there are [different legal justifications](#) for processing the different types of data that we will collect for the project. Therefore separate parts of the legislation will apply to the different types of data being collected for this project. Consent will be obtained from interviewees for a) collection of data about their personal characteristics b) participation in the interview. They will also be informed that the oral history interviews and their photographs will be published on the website and other media and deposited into an archive. In the project information sheet, we will inform the interviewees about the types of data that we will be collecting for the project and what they will be used for.

A general principle is that the personal information of interviewees must be treated as confidential. The interviews should also be treated as confidential, as they have to be approved by the interviewee before being published on the project website. Therefore the interviewee will need to agree to which information they approve to be in the public domain.

However an exception to this principle would be if there is a suspected safeguarding concern, in which case this would need to be reported to the safeguarding officer and may need to be taken further (see section 2f of this document, Reporting safeguarding concerns). Project participants will be made aware of this in the project information sheet. If there is any doubt, volunteers and project team members should seek advice and clarification from the project data protection officer (Sheila Ali).

#### b) Data security

All members of the HSS team should take appropriate technical and organisational steps to guard against unauthorised or unlawful processing (data breaches). All data will be stored in a secure online location and precautions will be taken to avoid data being accidentally disclosed (for example, password protection and secure storage of files). Where personal data needs to be deleted or destroyed, adequate measures will be taken to ensure data is

properly and securely disposed of. Any paper copies of agreements will be scanned in and saved on a secure online storage system, and the paper copy will be securely disposed of.

If any data breach occurs, it should immediately be reported to the project data protection officer (Sheila Ali; contact via project email address [hersalisburystory@gmail.com](mailto:hersalisburystory@gmail.com) ). She will log and investigate the breach if necessary, she will report it to the Executive Committee of SI Salisbury. Appropriate steps will be taken immediately to minimize the effects of the breach, and a suitable course of action will be taken to ensure a resolution to the breach.

#### c) Requests for data

Under Data Protection legislation, interviewees also have the right to request access to information that is held about them. To make a request for their personal information they would need to contact the SI Executive at the following email address:

The team would need to respond to the request within one month of receiving it.

The HSS website has a separate privacy notice, which can be found here: <https://hersalisburystory.com/privacy-policy/>

#### d) Data Retention

At the end of the project, in November 2021 (to be confirmed), any personal data which has been collected and is no longer needed for the purposes of the project will be securely disposed of.

The information gathered from the oral history interviews (and any photographs or videos of interviewees) will be published on the project website, which will be live for 5 years. A decision will be taken after this date whether to keep an archived version of the website. The oral histories will be deposited in the WSHC archive for future use by researchers. This information will be kept indefinitely. Some of the information will be made available for non-commercial reuse by the public, see section 4 below on Copyright.

## 2) Safeguarding

We recognise the need to ensure that everyone who takes part in the project, including interviewees, volunteers and the project team as a whole, has a right to feel safe and to be safeguarded from harm, abuse or distress of any kind. Interviewers will be trained in proper safeguarding procedures for children and adults.

#### a) Consent

Interviewees will be asked for informed consent at the start of the project, and they will be able to withdraw this consent at any time.

If the project involves children under the age of 16 interviewing members of their own family, consent for participation in the project will be taken from the child's parent/guardian. It is assumed that people over the age of 16 have the ability to consent for themselves.

If a volunteer was required to interview a vulnerable adult, they would need to hold a valid DBS check. It may be helpful for a gatekeeper such as a carer, relative or friend to be present before and during the interview to help with interpretation and explanation of the interview process. In line with [guidance published by Edge Hill university](#) research office, if an adult is incapable of giving informed consent, the interviewers should, without compromising the rights of that individual, liaise with someone who has duty of care towards that person, such as a family member or statutory carer. The volunteer must assess the person's capacity to take part in the study and must not assume that they lack capacity

to make a decision. Where a participant does lack capacity, it may be possible for someone who holds lasting/welfare power of attorney to contribute to consent, along with the potential participant. Volunteers can liaise with the project safeguarding officer (Helen Stewart) if they need any advice about this.

b) During the interview

- The interview should be arranged in advance for a specific and agreed time and place.
- Interviewers should carry a form of photographic ID when arriving to meet the interviewee for the first time.
- The interviewee is welcome to bring a 'chaperone'; a friend, colleague or family member with them to the interview.
- The interviewee will be able to request breaks during the interview.
- If the interviewee becomes distressed they will be able to take a break or terminate the interview.
- A time limit should be agreed for the interview. If further time or multiple appointments are needed, for example, because of breaks, this can be arranged with the interviewee.

c) COVID-19 pandemic

During the COVID-19 (coronavirus) pandemic, wherever possible, contact and interviews will be conducted by telephone, e mail and online video calling technology (e.g. Skype, Zoom, etc). If there is a need to visit the interviewee's home/other designated location (e.g. workplace), at all times the project team member will adhere to current public health guidelines. Whether or not the interview takes place remotely or in person, the interviewee will be welcome to bring a friend, colleague or family member with them to their interview(s).

d) Working with children

For the components of the project which involve working with schools, the project team member would first liaise with gatekeepers at the school (for example headteacher and teachers) to let them know about what the project involves, and organise the workshops after obtaining consent from parents of pupils. Any project team members or volunteers involved in this part of the project would be required to have a DBS check.

e) Safeguarding of HSS project team and volunteers

Lone working: If the interview takes place in person at the interviewee's home the interviewer will be asked to 'check in' with one of the project team members by phone or text message before and after the interview has taken place.

For both strands of the project, if a volunteer or team member has any concerns about bullying or harassment they can raise this with the project safeguarding officer (Helen Stewart) who can discuss their concerns with them in confidence.

f) Reporting safeguarding concerns

If a volunteer or project team member has a safeguarding concern or suspects that any abuse is taking place, they should immediately report any concerns to the project's safeguarding officer (Helen Stewart; contact via project email address

[hersalisburystory@gmail.com](mailto:hersalisburystory@gmail.com)). This person will have the responsibility of logging and investigating any concerns, allegations and complaints and taking the necessary actions.

Interviewees will be informed that the project team has a responsibility to report any concerns about their wellbeing or any potential harm to themselves or others.

### **3) Financial records**

The project team will ensure that accurate and detailed records with receipts are kept. This will guard against financial abuse and ensure that information is available for audit purposes. The proposed budget will be adhered to, and any changes to the use of funds will be agreed with the project co-ordinators and if necessary, permission will be gained from the funder to reallocate these funds.

### **4) Copyright**

Before the interview, interviewees will be informed that they will be assigning their copyright to SI Salisbury, and that their information will be published on the project website and used in publications and reporting. The oral histories and photographs will also be deposited into the WHSC archive.

According to Heritage fund requirements, any information produced by the project will be made publicly available for non-commercial use under Creative Commons licenses. We plan to publish extracts of interviews on the website (and in other learning materials/project dissemination outputs) under the **CC-BY-NC 2.0 UK** license. The whole interviews will be placed into the WHSC archive under the **CC-BY-NC-ND 2.0 UK** license. Interviewees will be made aware of this. The interviewee also has a right to note any restrictions, stipulations or embargoes on the content of the interview or write-up, and has a right to request changes before the information is published.

For the historic women strand of the project, volunteers and project team members will check that any written material for the website does not violate copyright legislation, and will seek permissions for use of any photographs.

### **5) Complaints Process**

Before commencing participation in the project, interviewees will be provided with a project information sheet which has the contact information of the project team and also the SI Salisbury executive committee, who will be able to investigate any complaints and take any appropriate action in accordance with the relevant legislation. The project information sheet also includes a link to the Information Commissioner's office website.

Policy version: 1

Date: 7<sup>th</sup> August 2020

Signed off by: SI Salisbury Executive (via email on 29<sup>th</sup> July 2020 with small amendments requested to draft version. Changes were made by SA on 7<sup>th</sup> August 2020.

Date review due: August 2021