

St Catherine's College, Oxford
Audio-Visual Recording Data Protection Impact Assessment

Controller Details	
Name of controller	St Catherine's College, Oxford
Project	The Use of Audio-Visual Recording Devices by College Staff
Name of controller contact	Justine Pila
1. Rationale for this DPIA	
<p><i>Explain broadly what the project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.</i></p>	<p>The GDPR requires data controllers to conduct a Data Protection Impact Assessment (DPIA) before commencing data processing that is likely to result in a high risk to the rights and freedoms of natural persons, particularly where new technologies are involved.</p> <p>Keeping College secure and protecting the health and safety of its members and visitors is extremely challenging in the current climate particularly. College and COVID-19 regulations require students to limit their social interactions in unprecedented ways. Ensuring that they do so is essential to managing the virus and limiting its spread.</p> <p>Under the College Statutes, primary responsibility for student discipline and welfare rests with the Dean, supported by the College's domestic and welfare staff. When health and safety or security incidents arise, they typically do so after hours in parts of the College not equipped with CCTV systems, including student Common Rooms and staircases. Often, the College Porters and Junior Deans will be the first on site. In the COVID-19 climate particularly, it is essential that they and other College staff are able to deal with incidents quickly, while also protecting students' rights and interests. Often, this will require them to assess situations and take immediate action to protect the health and safety of College members and visitors, including by dispersing gatherings and issuing specific instructions to one or more students. Formal reports will also need to be compiled in accordance with College regulatory procedures and policies.</p> <p>In exceptional circumstances, the use of audio-visual recording (AVR) devices, including mobile phones and body-worn videos, may be required to these ends. Where College staff use an AVR device to record sounds and/or images, information about individuals (personal data) may be obtained. These are data that the College needs to process in order to detect and prevent crime, to ensure the security of its premises, and to protect the health and safety of its members and visitors, including in the current era, by enforcing College and COVID-19 regulations (DP Purposes). For these reasons, a DPIA is deemed to be necessary.</p>
2. The Processing to be Undertaken	
<p>The nature of the processing <i>Describe the nature of the processing:</i></p>	<p>The personal data will be recorded by authorised members of College staff and shared within College to the extent that</p>

<p><i>how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or another way of describing data flows. What types of processing identified as likely high risk are involved?</i></p>	<p>this is a necessary and proportionate means of fulfilling the DP Purposes, and in accordance with the College's AVR Privacy Notice. The personal data will be transferred as soon as possible from the recording device to a secure computer system managed by the College's IT Officer. From there, they will typically be shared with the Dean, and may also, in exceptional circumstances, be shared with others, including University and public authorities and other third parties where legally required to do so. They will be securely destroyed as soon as the reason for recording them is fulfilled. College staff will not commence recording the personal data before announcing clearly to those present that they are doing so.</p>
<p>The scope of the processing <i>Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?</i></p>	<p>It is unlikely but possible that the data will include special category (sensitive) personal data. The volume of data processed and the frequency of its processing will depend on student behavior, which cannot be predicted. The number of persons potentially affected is approximately 1,025 people, being the total number of College students. The main geographical area potentially affected is the College's Manor Road site, though the other properties in and around Oxford in which College students live may also be affected. Data will be kept only for as long as necessary to fulfill the DP Purposes and the College's wider legal and regulatory duties. They will usually be deleted immediately, unless they contain evidence of a significant threat to health and safety, or security breach, or evidence of serious misconduct, in which case they will be stored only for as long as necessary to enable the matter to be properly investigated and any appropriate action to be taken.</p>
<p>The context of the processing <i>Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?</i></p>	<p>The College is a charitable organisation that exists to advance learning, education and research in the arts and the sciences, and to fulfill the other charitable objectives described in its Charter. To these ends, it provides accommodation and other domestic services to different categories of student. In light of the COVID-19 pandemic particularly, members of the College and wider community expect appropriate measures to be in place within the College to ensure that its educational and other objectives are pursued in a manner that protects their health and safety, and their security, and that any conduct in breach of College and COVID-19 regulations, including those arising at general law, are identified and dealt with appropriately. The individuals affected by this project will potentially include children and other vulnerable persons, including persons with learning difficulties. The processing will not raise public or security concerns beyond those raised by similar types of personal data processing, including the use of CCTV systems, and restricting the data processing in the manner proposed will ensure that these concerns are minimised.</p>
<p>The purposes of the processing <i>What do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing for you, and more broadly?</i></p>	<p>The College seeks to fulfill the DP Purposes in furtherance of the public interest and fulfillment of the College's health and safety obligations to its staff, students, and visitors.</p>
<p>3. Consultation Process</p>	

<p><i>Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?</i></p>	<p>This project has been devised by the College Dean, and approved by the College's Governing Body, comprising its charitable trustees and representatives of its undergraduate and graduate student communities. The College has informed all staff and students of its intention to process their personal data in the manner and for the purposes described in this DPIA by means of a Privacy Notice describing the relevant data processing arrangements.</p>		
<p>4. Necessity and Proportionality</p>			
<p><i>Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?</i></p>	<p>The data processing is an essential, effective and proportionate means of protecting the public interest and meeting the College's health and safety obligations to its students, staff and, visitors. The data processing will be limited to what is necessary to achieve the DP Purposes and to fulfill the College's wider legal and regulatory obligations. Data will not be used for any unrelated purposes without the data subjects' explicit consent. All data processors will be required to take appropriate security measures to protect the data, in accordance with the University's and College's Information Security and Data Protection policies and procedures.</p>		
<p>5. Risks</p>			
<p><i>Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.</i></p>	<p><i>Likelihood of harm (Remote, possible or probable)</i></p>	<p><i>Severity of harm (Minimal, significant or severe)</i></p>	<p><i>Overall risk (Low, medium or high)</i></p>
<p>Inadequate organisational or technical security measures resulting in unauthorised access to the data, data loss, or data breach due to cyber-attack or other technical weakness.</p>	<p>Remote</p>	<p>Significant psychological distress to the data subject; significant reputational damage to the College</p>	<p>Low</p>
<p>6. Risk Reduction Measures</p>			
<p><i>Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5.</i></p>			
<p><i>Options to reduce or eliminate risk</i></p>	<p><i>Effect on risk (Eliminated, reduced or accepted)</i></p>	<p><i>Residual risk (Low, medium or high)</i></p>	<p><i>Measure approved (Yes or no)</i></p>
<p>The data processors will be required to comply at all times with the University's and College's Information Security policies and procedures and with the College's AVR Privacy Notice. Data will be stored on a secure computer system managed by the College's IT Officer that requires credential-based authentication to access, and on servers behind firewalls that are continuously monitored for</p>	<p>Reduced</p>	<p>Low</p>	<p>Yes</p>

security.			
7. Sign Off and Record Outcomes			
Item	Name/position/date	Notes	
<i>Measures approved by:</i>	The Governing Body		
<i>Residual risks approved by:</i>	N/A	<i>If accepting any residual high risk, consult the ICO before going ahead</i>	
<i>DPO advice provided:</i>	11 October 2020	<i>DPO should advise on compliance, step 6 measures, and whether processing can proceed</i>	
<i>This DPIA will be kept under review by:</i>	The Dean and Home Bursar	<i>The DPO should also review ongoing compliance with the DPIA</i>	

Date of Governing Body approval: 14 October 2020