

Keble College GDPR ROPA - Security, including CCTV - v1.4 (July 2020)

Category of personal data	Source of the data	Why we process it	How long we keep this data	Our lawful basis for processing	Details relating to lawful basis (where applicable)	Special category grounds	Special category-details of public interest etc (where appropriate)	Criminal Conviction Grounds	Criminal conviction grounds (further information)
CCTV recordings and still images taken from recordings, records of who has accessed the CCTV images and recordings and the reason for accessing them.	We generate this data about you	We hold recordings of CCTV footage for a limited period for the purpose of providing safety and security on College property and to assist with the prevention and detection of crime or other unlawful activity, including misconduct as an employee or student. Where an incident is recorded we may need to capture images for the purposes of any investigation by the College or police.	Routine CCTV footage is retained for 31 days. CCTV footage used during an investigation into an internal incident, and associated correspondence, is retained for 6 years following the closure of the investigation. A log of access to CCTV footage is kept for 6 years.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms. Processing is necessary for compliance with a legal obligation.	The College, its members and visitors have a legitimate interest in being in a safe and secure environment. Logs of who has accessed the recordings and their reason for accessing them are recorded to comply with the College's security and accountability obligations under data protection law.			The processing is necessary for purposes of the prevention or detection of an unlawful act and must be carried out without the consent of the data subject, so as not to prejudice those purposes.	
The College holds contact information for students, emergency contacts, and bedroom numbers for students.	We obtain this data from the University of Oxford We obtain this data from you We generate this data about you	So that we can contact staff, students or their nominated emergency contacts in case of an emergency.	Whilst you are a registered student.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College, its staff and students have a legitimate interest in being able to communicate with each other in case of an emergency.				
Security access records for staff, students and visitors (e.g. conference delegates, contractors). This includes your name and potentially any identity number (e.g. linked to your key swipe card or fob, including your university card number) and/or vehicle registration number. This information is also linked to our records of the timing of your access to any of our	We generate this data about you	We process this information to assist with security of College premises, so that we have records of who is on the premises in the event of a fire or similar emergency, to prevent unauthorised access to College premises and to assist with issuing replacement keys, cards and fobs.	Access control and access logs are retained for six months. CCTV records are retained for 30 days. Security incidents, accident, health and safety, and similar records are retained for 7 years. If incidents are mentioned during Governing Body meetings, the minutes will be retained in the College archive in perpetuity. Visitor Records - such as lodge diary sheets, visitor logs, and	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College, its members and visitors have a legitimate interest in implementing such measures to help maintain College safety and security.				

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buildings or offices generated manually when you sign in with us and electronically by our key swipe card/fob system. We also hold records of the access rights that individual key holders have.			records relating to the allocation of keys and access cards will be retained for one year after their return.						
Room bookings consisting of room, date/time, booking description and the identity of the person/society/organisation booking the room. Records of requests and bookings for rooms, including records of any decisions the College makes pursuant to its obligation to take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for members, students and employees of the College and for visiting speakers.	We obtain this data from you We generate this data about you	As part of the system for providing College rooms and facilities to members of the College.	For one year after the end of the relevant academic year	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms. Processing is necessary for compliance with a legal obligation (where freedom of speech issues are involved).	The College has a legitimate interest in making its rooms available to members of the College to enable events to be held.	Substantial public interest under the UK Data Protection Act 2018	Where it processes special category data for these purposes, the College is exercising functions conferred under the Education (No 2) Act 1986. The processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning freedom of speech within the law.	The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018	Where it processes criminal convictions/allegations of criminal activity data for these purposes, the College is exercising functions conferred under the Education (No 2) Act 1986. The processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning freedom of speech within the law.
Names and addresses for delivery of mail and other items, including Parcel receipt and management records: containing names of recipient, location of parcel and who signed for it.	We generate this data about you		The parcel delivery log and associated correspondence are retained for one year after the current academic year. Where people have asked for their post to be forwarded, this information will only	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College and its members have legitimate interests in receiving deliveries, and in maintaining records to help reduce the risk of deliveries being lost after receipt at the College.				

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			be retained for as long as the service is required.						
Punt booking records consisting of the date and time of booking, the name and purpose of booking.	We obtain this data from you We generate this data about you	To assist with administration and security of College punts.	For six months.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College has a legitimate interest in providing access to its punts.				
Pigeon hole management records, consisting of the names of pigeon hole holders.	We generate this data about you	To assist with delivering post and other items to pigeon holes.	For as long as you have the pigeon hole.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College and its members have a legitimate interest in operating a pigeon hole system to assist with the efficient delivery of post and similar items.				
Security notifications (issued by the University Security Services and the police)	We obtain this data from third parties	We hold images and information relating to security incidents, as sent us by the police and the University Security Services, for the purpose of providing safety and security on campus and to assist with the prevention and detection of crime	These records will be retained for one year after their receipt.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms. Processing is necessary for compliance with a legal obligation.	The College, its members and visitors have a legitimate interest in being in a safe and secure environment.			The processing is necessary for purposes of the prevention or detection of an unlawful act and must be carried out without the consent of the data subject, so as not to prejudice those purposes.	

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Accident reports records containing information about the date and nature of the accident, who was involved, their home address, who witnessed it and any steps taken concerning it. Health and safety records.	We generate this data about you	So that we have a record of accidents occurring on College premises. In some cases the College also has a legal obligation to record and report accidents to the relevant regulatory authority.	40 years after last entry	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms; The processing is necessary for compliance with a legal obligation.	The College has a legitimate interest in creating and retaining records of accidents on College premises to assist with its management of health and safety risks. In some cases the College is obliged to record and report accidents under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.	Substantial public interest under the UK Data Protection Act 2018	The processing is necessary for the protection of members of the public from any potential health and safety risks, and must be carried out without the consent of the individual so as not to prejudice such protection. Processing to record and report relevant accidents is (where a legal obligation is imposed on the College) in the substantial public interest and pursuant to the exercise of a function conferred on a person by an enactment.		
College security holds contact details for contractors working on College premises, and information about the contract they are working on.	We obtain this data from you	So that we may contact those working on College premises to discuss the work they are undertaking, or in an emergency.	Whilst work is ongoing or the need for further work involving you is anticipated.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College and its contractors have a legitimate interest in being able to communicate about the work they are undertaking, or in an emergency.				
Visitor records, signing-in sheets, records of keys and access cards/fobs issued, including the name of the person to whom the key/fob has been issued and the identity number of the fob.	We obtain this data from the University of Oxford We generate this data about you	So that we have a record of who holds keys and access cards/fobs to support College security arrangements.	Visitor Records - such as lodge diary sheets, visitor logs, and records relating to the allocation of keys and access cards will be retained for one year after their return.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College has a legitimate interest in maintaining the security of its premises.				