Aims

Pembroke College seeks to ensure, as far as reasonably practical, the security and safety of all persons and property while on College premises. The College also seeks to meet the requirements of the Human Rights Act, Article 8 Right to Private life, Safeguarding Policy and The Data Protection Act, while enabling effective room management and ease of use.

Objectives

This document details the operating standards and procedures for the SALTO electronic key system used at Pembroke College, Oxford, in accordance with the requirements of:

- The Data Protection Act 1998 (DPA).
- Pembroke College safeguarding policy.

Operational Criteria.

To meet the requirements of the Objectives and as far as practicable, effective room management and yet cater for user operational needs, an access criteria is applied. The Criteria are set out as headings (As below). These criteria may bar or grant access accordingly.

1. Data Protection.
   A legal requirement that information is used fairly and lawfully for limited, specifically stated purposes. Used in a way that is adequate, relevant and not excessive. Accurate and kept for no longer than is absolutely necessary. Handled according to people’s data protection rights, kept safe and secure. SALTO carries information both individually on the card and also within the system.

2. Safeguard Policy.
   This policy applies to all staff, students and volunteers who may be working with children (i.e. those aged under 16), young persons (i.e. those aged 16 to 18) and adults in a vulnerable situation whom the College encounters through its teaching and research activities as well as through its outreach programmes.

3. Protection of Property.
   The College Community has a duty of care to protect property and to reduce the impact of crime. A Crime Reduction strategy will always entail the securing of doors and limiting access to those who have an operational requirement.
4. Personal Safety.
   Students and staff should be secure and feel secure in their room or workspace.

5. Privacy.
   Everyone has the right to respect for his or her private life, (Article 8). An individual’s room or office is their private space and will be accorded due respect.

6. Safety as per the Health and Safety at work Act.

Access Management

To achieve the balance of effective system management, room management, ease of use and compliance with the objectives, various access groups have been set out. Additionally various management methods have been employed. Persons may belong to more than one group, on a temporary or permanent basis. These groups are set out in Appendix A.

Protected rooms or locations.

As a protective measure some rooms or locations are given an enhanced access level. These rooms are classified as such by meeting all or some of the criteria. Such locations have a custodian/owner who is responsible for setting access arrangements and examples of the limiting criteria are:

- High value space or contents (Monetary or historically important).
- Confidential or sensitive material present.
- Privacy.
- Operationally sensitive asset requiring specific training (Auditorium Control Room).
- Hygiene.

Current Rooms meeting criteria

- Masters Study.
- Masters PA Office.
- Art Gallery.
- Art store.
- Silver Safe.
- Kitchen.
- Staff changing rooms.
- Server rooms.
- Parcel room.
- College Bar
- Workshops

Operational Management

The day to day operational management of the SALTO key system is the responsibility of the Head Porter or their Deputy.

General Procedures

ALL SALTO cards are subject to a three month update requirement and are therefore ‘lifed’ for that time period. The rationale being:
• DATA Protection Act compliance.
• Software update.
• Refreshing access changes.
• Ensuring a robust audit trail process.
• The right person has the correct key card.
• The key card is still operational.
• Effective management of the student term cycle, to ensure there is no unauthorised early term return.

Process

Every three months, all SALTO card users to update their cards at the lodge. All conference and room cards are also updated in this time scale by the lodge staff.

Student Term Cycle.

Student Cards set to expire at the end of term, those on a 38 week contract will need to update their card at this time of expiry. This will ensure they have sufficient update to cover the holiday periods. Students to update their card at the end and start of each term.

Review.

To ensure compliance with the policy there will be a six monthly review of major access changes within that period. The review will encompass, access levels, procedures, temporary changes operational changes within the preceding six months. This review will be carried out by the Home Bursar, Head Porter.

Hardware.

The night porter will carry out weekly monitoring of all locks, noting which have a low battery reading and pass this information to the Maintenance Department. The night porter will also regularly refresh the lodge held SALTO key cards.

Data and Privacy Protection.

Responsible Persons.

The College Data Protection Officer is The Bursar John Church.

Data Protection Officer for the SALTO key system is the Home Bursar Mike Naworynsky.

• The Home Bursar is the final decision making authority as regards requests under the terms of the Freedom of Information Act, requests from Data Subjects, other departments and external agencies.

Data Controllers:

(a) Head Porter Steve Capper
(b) Deputy Head Porter Roger Charles
(c) IT Manager Simon Thomson
• Responsibilities for safeguarding the data, preventing unauthorised access and compliance with the operating principles.

All operators of the SALTO system will be made aware of their legal responsibilities, regarding safeguarding the data and access requests. The Head Porter will ensure that lodge staff are fully briefed and trained in respect of the functions, operational and administrative, arising from the use of SALTO.

Contractors working on the system will sign an undertaking that they understand and will comply with Pembroke College, SALTO Policy Standards and Procedures. SALTO cards are obtained from an external source and are new and free from any data. SALTO cards are reused but before re-issue are wiped clean of any data.

Access by a law enforcement agency

Law enforcement agencies may view or request data on the SALTO system, subject to providing an appropriate written Data Protection Act 1998 request and in accordance with the protocols contained within this document. In very urgent serious cases of crime or public safety, relevant law enforcement agencies may view or request data if requested in person and subject to authorisation by one of the Data Controllers.

Access by a subject

Persons may make an application in writing to the Home Bursar requesting data held on the system which specifically relates to them.

System Location

<table>
<thead>
<tr>
<th>Pembroke College (main site)</th>
<th>Pembroke College (Rokos Quad)</th>
<th>Geoffrey Arthur Building</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pembroke Square</td>
<td>St Ebbes</td>
<td>Longford Close</td>
</tr>
<tr>
<td>Oxford</td>
<td>Oxford</td>
<td>Whitehouse Road</td>
</tr>
<tr>
<td>OX1 1 DW</td>
<td></td>
<td>OX1 4NJ</td>
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</tbody>
</table>

Policy and Procedures Review

This policy will be reviewed on an annual basis.

Document owner: Steve Capper

Head Porter

Pembroke College

Oxford.