

## Jèrriais Section of the Jersey Eisteddfod - Data Protection Impact Assessment - Online festival Winter 2022

### **STEP 1: IDENTIFY THE NEED FOR A DPIA**

Explain broadly what the project aims to achieve and what type of processing it involves.

The Jèrriais Section of the Jersey Eisteddfod is going online due to Covid-19 restrictions making a live festival impractical. The festival will take place using video conferencing platform Microsoft Teams. Teachers will visit participants' schools and join a video conference at a scheduled time. Participants will do their performance live and then receive feedback from the adjudicator, who will be based at St Ouen's Parish Hall.

### **STEP 2: DESCRIBE THE PROCESSING**

How will you collect, use, store and delete data? What is the source of the data? Will you be sharing the data with anyone? What types of processing identified as likely high risk are involved?

#### **NATURE OF THE PROCESSING**

There will be no recordings made of the participants' performances. All performances will be live.

#### **SCOPE OF THE PROCESSING**

Individual entrants, pairs, small groups and large class groups of children will be performing pieces to camera.

The data is classed as 'special category' because the visual nature may make it possible to identify racial and ethnic origin.

Approximately 160 individuals are affected.

All entries will originate from the island of Jersey.

#### **CONTEXT OF THE PROCESSING**

The Jèrriais Teaching Service offers language lessons to children and adults. All competition entrants are students of this service. Data Protection and Safeguarding policies are publicly available on the Learn Jèrriais website.

All entrants have the right to withdraw from the festival at any time.

### **PURPOSES OF THE PROCESSING**

The purpose is to organise and hold an online Jèrriais Eisteddfod festival.

The intended affect on individuals is to enable them to participate in the competition despite Covid-19 restrictions.

The benefit for the Jèrriais Teaching Service is to enable a competition to take place despite Covid-19 restrictions. More broadly, Jèrriais is an endangered language and the annual Eisteddfod festival plays a huge part in raising the profile of the language and encouraging participation in language learning activities. The benefits for the children include having the opportunity to enter a competition of stature and experience all the benefits this brings even in a time when so many such opportunities have been lost to them.

### **STEP 3: CONSULTATION PROCESS**

Consider how to consult with relevant stakeholders.

The Jèrriais Section's plans have been discussed in detail with members of the Eisteddfod Autumn Festival Committee as well as the Jèrriais Section Committee. The Jèrriais Section organiser is sharing all documentation with members of both committees and is responding to questions and scrutiny from committee members.

The Jèrriais Teaching Service has consulted with the Government of Jersey CYPES Head of Governance and IT Project Manager about the safest way to hold an online festival.

The Jèrriais Section organiser has received training in how to use Microsoft Teams conferencing software for the purposes of running an online festival.

### **STEP 4: ASSESS NECESSITY AND PROPORTIONALITY**

Describe compliance and proportionality measures.

Lawful basis: The Jèrriais Teaching Service will seek written permission from parents for their children to participate in the festival.

Achievement of purpose: The use of video conferencing software is necessary in order to meet the purpose of running an online festival.

Consideration of alternative options: The Jèrriais Teaching Service has considered alternative options in discussion with members of the Eisteddfod Autumn Festival Committee. A repetition of last year’s arrangements involving the recording, storing and sharing of videos of performances was deemed too difficult to organise with such short notice, in terms of the requirements to satisfy data protection and safeguarding requirements.

Preventing function creep: There will be no retention of data as there will be no videos taken of performances.

Data quality: Not applicable.

Data minimisation: Not applicable.

Ensuring processors’ compliance: The adjudicator and assistant adjudicator will be based at St Ouen’s Parish Hall and accompanied by the Secretary of the Eisteddfod Committee and a member of the Jèrriais Teaching Service, who will ensure no screen shots or recordings of the performances are taken. All children performing will be accompanied by a teacher, who will access and monitor the Teams meeting.

### STEP 5: IDENTIFY AND ASSESS RISKS

Describe the nature of the risk

SOURCE	LIKELIHOOD OF HARM	SEVERITY OF HARM	OVERALL RISK
Access to Teams meeting while in progress by uninvited individuals.	Possible	Severe	Low
Recording of performances by viewers.	Possible	Significant	Low
Participants taking part in the festival without permission.	Remote	Significant	Low

**STEP 6: IDENTIFY MEASURES TO REDUCE RISK**

Identify additional measures you could take to reduce or eliminate risks

RISK	OPTIONS TO REDUCE OR ELIMINATE RISK	AFFECT ON RISK	RESIDUAL RISK	MEASURE APPROVED YES/NO
Access to Teams meeting while in progress by uninvited individuals.	Microsoft Teams has been risk assessed and approved for use by Government of Jersey. The festival organiser will administer the Teams meetings and monitor who is attending. The adjudicator and assistant will be accompanied by a member of the Jèrriais Teaching Service. Entrants will be accompanied by teachers, who will access and monitor meetings from their end.	Reduced	Low	
Recording of performances by viewers.	Teachers will ensure no screen shots or videos of performances are taken.	Eliminated	Low	
Participants taking part in the festival without permission.	Teachers have collected permission forms from parents and these are cross checked against the list of entries. These are double checked before the event.	Reduced	Low	

This DPIA will be kept under review by:

Marianne Sargent (festival organiser)

The DPO should also review ongoing compliance.