

IADT CCTV Policy

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Purpose	To address the data protection issues with having closed circuit television (CCTV) on the premises
Commencement Date	25 May 2018
Date of This Review	May 2021, or as required, in response to internal changes or external legislative changes
Who needs to know about this document	All Staff, Students, Tenants, Visitors, Contractors, Blackrock Education Centre (BEC), Monkstown Educate Together National School (METNS)
Revision History	Version 1 – this is a revision to CCTV Operations, SOP 3.12, date 03.09.07
Policy Author	Estates and Campus Services Manager
Policy Owner	Estates and Campus Services Manager

CCTV Policy

Introduction

The purpose of this policy is to address the data protection issues associated with having Closed Circuit Television (CCTV) on the premises. CCTV has been installed in all buildings (see Appendix 1) and on the grounds of IADT. The system comprises of a number of camera installed at strategic locations. The cameras are fully operational and either fixed or with pan, tilt and zoom facilities. Images are a mixture of colour, monochrome and infra-red. The system is operated from a control centre on campus.

Definitions

Personal Data: is data as defined in the Data Protection Acts. It should be noted that for the purposes of this policy this includes vehicle registration numbers.

Data Controller: Dun Laoghaire Institute of Art, Design and Technology (IADT), Kill Avenue, Dun Laoghaire, Co. Dublin.

Data Protection Officer (DPO): Bernard Mullarkey, Secretary/Financial Controller, IADT

Data Processors: IADT Estates & Facilities Staff, Contracted Security - Noonan Services Group Ltd. Unit 3, Swords Business Park, Mountgorry, Swords, Co. Dublin; PSA licence 02264, CCTV system maintenance contractor - EKA Security Systems Ltd. 105 Claremont Ct, Cabra East, Dublin 11; PSA licence 00006

Data Protection/FOI Officer: Information Officer, IADT

Campus: includes all lands under the direct and indirect control of IADT on Kill Avenue, Dun Laoghaire and includes lands occupied and /or leased to BEC and METNS.

Objectives of the CCTV System

The objectives of the CCTV as determined by the Data Controller and which form the lawful basis (Legitimate Interests Article 6 (1) (f) and Public Interests Article 6 (1) (e)) for the processing of data are:

- To protect and enhance safety, security of the Institute community, staff, students, contractor and visitors to the Campus.
- To help deter crime.
- To aid the detection of crime and provide evidential material for court proceedings.
- To assist in the investigation of accidents/incidents as defined in the H&S Policy.
- To assist in the prosecution and/or defence of insurance claims
- To assist IADT investigations including but not limited to disciplinary and grievance processes.
- To assist in surveying of the Campus to ensure the property is maintained in good order.

General Principles of Operation

The information obtained by CCTV is controlled in accordance with the Data Protection Acts 1988 to 2018, as amended and the provisions of the GDPR Regulations. Signage (examples below) has been placed throughout the Institute buildings and grounds to inform users of the Institute that CCTV is in operation. These signs also give a contact telephone number for persons wishing to discuss the processing of CCTV information.



**Tá an limistéar seo
faoi mhonatóireacht
ag ceannaraí TCI**

**This areas is
monitored by CCTV**

Warning – This CCTV system is operated for the purpose of the security, health, safety and protection management
Please direct queries to:
caretakersdesk@iadt.ie or tel: (01)239 4660

The CCTV System will be operated fairly, within the law, and only for the purposes for which it was established.

Anyone found to have unlawfully compromised the privacy of individuals in breach of this Policy will be subject to the disciplinary procedures of the Institute and may be reported to the appropriate authorities. Non-compliance of third parties will be subject to contractual penalties or may face criminal charges by the authorities.

Storage & Retention

The Data Protection Act states that *“the data shall be kept in a form that permits the identification of a data subject for no longer than is necessary for the purposes for which the data are processed”* section 71 (1)(e). The Institute currently uses a hard drive system to record images and images may be kept for up to 45 days depending on activity levels picked up by the recorders.

All recordings are maintained on a secure server in a locked location. Only the Estates & Campus Services Manager/ Assistant Estates & Campus Services Manager and EKA have access to the server.

Where an incident is reported to the DPO, the recorded images relating to the incident will be retained for a period of up to 2 years or as otherwise directed by an Garda Siochana or the Institute’s Legal Advisors.

Due to the nature of the CCTV recordings, it will not be possible to comply with a request made under Section 91 (1) (rectification of inaccurate data) and/or 91 (2) (erasure of data) either in the period of 45 days following the recording and/or in circumstances where a recording has been kept for the purposes of an investigation, during the period of that investigation. All recordings are automatically overwritten after a period of 45 days.

Access to Cameras and Images

The CCTV display screens are held within the Security Office in the Atrium Building and the images on all cameras are live streamed to this location and visible to the DPO and all Data Processors. Access to this office is controlled by a card access system.

All recorded images are password protected and are only accessible by the Estates & Campus Services Manager and the Assistant Facilities Manager with the specific authorisation of the DPO or in the event of an emergency on their own authorisation.

Supply of Data to Enforcement Agencies

An Garda Siochana

Where a member of An Garda Siochana requires access to CCTV footage for an investigation, the Institute (DPO, Estates and Campus Services Manager or Assistant Estates & Campus Services Manager) will satisfy themselves that the request forms part of an investigation. The Institute will co-operate with all legitimate requests.

Where a request for access to the CCTV system is for the purposes of surveillance by a An Garda Siochana, the

authorisation of the President of the Institute is required.

Other Enforcement Agencies

Where an appropriately authorised Officer of an Agency, authorised under legislation, is received the DPO must satisfy himself that both the Agency and the Officer are authorised under legislation to access the CCTV system.

Access Requests

Any person whose image has been recorded has a right to be given a copy of the information recorded. To exercise that right an application should be sent to the Information Officer. They can be contacted at 239 4947 or dp@iadt.ie. More information on access requests can be found on the Data Protection Commissioner's website: www.dataprivacy.ie

To facilitate this request, the person must provide necessary information by detailing information such as the date, time, location and duration of the recording. They should also provide suitable photo identification along with appropriate confirmation of address.

Where, in the opinion of the DPO, the image is of poor quality as does not clearly identify an individual that image will not be considered to be personal data. Before releasing this information the images of others will be obscured.

In the event of an incident IADT reserves the right to review the content and disclose the information arising as appropriate.

Under no circumstances will an access request be permitted in respect of images or personal details other than of the requester.

For the purposes of his policy any access requests in respect of a vehicle where an image includes a vehicle registration number, the requester will be required to establish to the satisfaction of the DPO that they are the registered owner of the vehicle.

Appendix 1

List of buildings/external areas in Dun Laoghaire Institute of Art, Design and Technology where CCTV are located:

- Atrium Building
- Backlot Building
- Carriglea Building
- Media Cube Building
- National Film School Building
- Roisin Hogan House
- Quadrangle
- Campus grounds, including car parks, roads, pitch, walkways, waste compounds entrances to buildings and exits from buildings