



Galway-Mayo Institute of Technology (GMIT)

CCTV Policy & Procedures

Version 3.0

Document Location

Data Protection Officer (DPO)

Revision History

Date of this revision: 22/01/2019	Date of next review: Jan 2021
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Version Number/ Revision Number	Revision Date	Summary of Changes	Changes marked
1.0		Initial GMIT draft agreed	
2.0	31/08/2017	Restructured in line with a standard policy template. Updated to reflect guidance issued by the Office of the Data Protection Commissioner. Revision of Subject Access Form and Section 8 Access Request Form.	
3.0	27/06/2019	Revised in line with GDPR	

Consultation History

Version Number/ Revision Number	Consultation Date	Names of Parties in Consultation	Summary of Changes
1.0	No information available		
2.0	Feb-Aug 2017	CPF, Management Group, Executive, Governing Body	Amendment to Section 6, Amendment to Section 7.2.2
3.0	22/01/2019 08/02/2019 25/02/2019	Executive Management Group CPF	Amendment to Section 9.0; Approved for consultation No changes Amendment to Section 5.0

Approval

This document requires the following approvals:

Revision Number	Title	Date
1.0	No information available	
2.0	Governing Body	31/08/2017
3.0	Governing Body	27/06/2019

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1.0 Introduction

GMIT, as a data controller, processes the personal data of individuals through its use of Closed Circuit Television (CCTV) in its campuses in Galway, Mayo and CCAM.

Recognisable images captured by CCTV systems are personal data and are therefore subject to the provisions of the General Data Protection Regulation (GDPR) and the Data Protection Acts 1988-2018 [hereafter referred to as “data protection legislation”].

2.0 Purpose of Policy

The purpose of this policy is to regulate the use of CCTV in the monitoring of both the internal and external environs of the Galway campus, Mayo campus and CCAM. The aim is to ensure that CCTV is used transparently and proportionately in accordance with data protection legislation, the Institute’s Data Protection Policy and guidance provided by the Data Protection Commission.

3.0 Scope

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material.

It applies to staff, students and visitors to GMIT.

4.0 Ownership of the CCTV System

GMIT is the data controller and all recorded material is the property of GMIT.

5.0 Purposes of CCTV

CCTV surveillance is employed for the following purposes:

- Security: To assist in providing for the security of students, staff and visitors; to periodically monitor and protect GMIT buildings and facilities; to assist in the prevention and detection of crime and prosecution of offenders.
- Risk Management: To assist in providing for the safety of students, staff and visitors; to assist in the resolution of incidents involving workplace hazards, injuries or near misses; to assist in the processing of allegations/claims against GMIT.
- Traffic Management: To assist in the identification of car parking and traffic management problems and assist with the enforcement of car parking regulations.
- To assist GMIT where its grievance, disciplinary or dignity at work procedures have been invoked. CCTV surveillance will not be used to monitor individuals to gather evidence to invoke a procedure.
- To enable GMIT to respond to legitimate requests from third parties for CCTV footage of incidents e.g. for legal proceedings or insurance investigations.

Where, in the carrying out of these purposes, images are obtained of persons committing acts of an illegal nature and / or acts which breach GMIT’s rules and regulations, these may be used as evidence.

While every effort has been made in the layout of the CCTV system to give it maximum effectiveness, it is not possible to guarantee that it will detect every incident that takes place on campus.

6.0 Lawful Basis

The lawful basis permitting the processing of images of individuals for the above purposes is Article 6(1)(f) of the GDPR i.e. the processing is necessary for the legitimate interests pursued by GMIT and its users.

7.0 Signage

Signage is displayed at prominent locations throughout the Institute so that students, staff and visitors are aware that CCTV cameras are in use:

<p>Rabhadh CLI i bhfeidhim</p>  <p>Warning CCTV in operation</p>	<p>Images are being recorded for the purposes of security, risk management, and traffic management and to assist with grievance/ disciplinary/ legal/ insurance issues</p> <p>Further info: Email: cctv@gmit.ie</p>	<p>Tá íomhánna á dtaifead ar chúiseanna slándála, bainistiú riosca, bainistiú tráchta agus chun cuidiú le ceisteanna casaoide / disciplíneacha / dlí / árachais</p> <p>Tuilleadh eolais: Rphost: cctv@gmit.ie</p>
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8.0 Installation and Maintenance of the CCTV System

CCTV systems are installed and maintained by PSA licensed CCTV companies contracted by GMIT. The CCTV companies operate under the instruction of GMIT and provide GMIT with assistance in pixelating images of 3rd parties when an approved access request is received. In so doing, the CCTV companies are considered to be data processors.

Data protection legislation places a number of obligations on data processors, including having appropriate security measures in place to prevent unauthorised access to data or unauthorised alteration, disclosure or destruction of data. The Institute will put in place contracts with CCTV companies, clearly setting out the responsibilities and liabilities of both parties.

9.0 Management, Storage & Retention of CCTV Footage

The systems are managed by the following CCTV administrators:

- Galway campus & CCAM - Corinna Gavin (cctv@gmit.ie)
- Mayo campus - Anne Donnelly (anne.donnelly@gmit.ie)

On the Galway campus and at CCAM, recordings are securely stored in a locked location and access is password controlled. On the Mayo campus, recordings are stored on a computer hard-drive accessed only by authorised personnel. Viewing is restricted to authorised personnel. CCTV footage is not viewed remotely/off-site. Camera monitors are located in areas where they are kept out of view of staff, students and visitors.

In accordance with data protection legislation, CCTV footage is retained for no longer than is necessary. All recordings are retained for a maximum of 28 calendar days. After this time, they are safely deleted. When used in conjunction with an investigation or as evidence, recordings may be retained by request specifically in that context until the issue is resolved. After this period, images are safely deleted.

Camera operators shall act with utmost probity at all times and be mindful of exercising prejudices which may lead to complaints of the system being used for purposes other than those for which it is intended. Footage shall not be copied (e.g. by using a mobile phone).

10.0 Procedure for Handling Access Requests

Disclosure of images from the CCTV system is controlled and consistent with the purposes for which the system exists. All requests to access CCTV footage are channelled through the relevant CCTV administrator. All access to images is logged.

10.1 Subject Access Requests

Individuals have the right to access their personal data including their image in CCTV recordings.

Requests shall be made in writing to the CCTV administrator, either by email or using a 'CCTV REQUESTS - Subject Access Request Form' (see below). Requests must include the date, time and location where the CCTV image was recorded. ID may be required. GMIT aims to respond promptly and at the latest within one month of receiving a valid request.

Downloading of footage is carried out by the CCTV administrator, in the case of the Galway campus and CCAM, and by the CCTV company in the case of the Mayo campus. Recorded material is handled with care and in a confidential manner to ensure complete regard for individual privacy. Footage is downloaded onto a DVD or memory stick; a copy is given to the requester and a copy is retained by GMIT in a secure location. Where CCTV images reveal other individuals, their faces are pixelated so that they are not recognisable. The footage in question is retained until the purpose for which it was downloaded has ended, at which point the footage is safely and permanently deleted.

Concerns regarding access to one's own personal data in CCTV footage can be raised with the Data Protection Officer (dpo@gmit.ie). Individuals also have the right to submit a complaint to the Data Protection Commission.

10.2 Third-Party Access

10.2.1 Access Requests by An Garda Síochána

Access requests by An Garda Síochána shall be processed where such processing is necessary and proportionate for preventing, detecting, investigating or prosecuting criminal offences. Requests are approved by the campus CCTV administrator. Verbal requests are sufficient to allow for the viewing of the footage. However, verbal requests for copies of footage must be followed up with a formal written request using GMIT's 'CCTV REQUESTS – Third Party Request Form' (see below). A log is maintained of all requests by An Garda Síochána.

10.2.2 Other Third-Party Access

Disclosure of information to other third parties is made in strict accordance with the purposes of the system and is limited to the following authorities:

- CCTV administrators and specific staff in Buildings & Estates*
- Members of GMIT staff involved with Institute grievance, disciplinary or dignity at work procedures**
- Legal or insurance representatives of data subjects (with written consent of data subjects)**
- GMIT's insurers/assessors**
- In exceptional cases, to others to assist in the identification of a victim, witness or perpetrator in relation to a criminal incident**
- CCTV companies for service/repair and to pixelate images***

* Access is logged

** Requests must be made in writing on a 'CCTV REQUESTS - Third Party Access Request Form' (see below). A decision to refuse such a request by the CCTV administrator may be appealed to the Data Protection Officer and further to the President (or nominee) on procedural grounds only.

*** Access is documented

11.0 Procedure for Requesting Installation of Additional CCTV Cameras

Requests for the installation of additional cameras on GMIT premises shall be made in writing (by email) by a member of the Executive Board to the relevant CCTV administrator.

A Data Protection Impact Assessment (DPIA) shall be carried out by the applicant in consultation with the DPO using the GMIT DPIA Template. The DPIA will require the applicant to substantiate why the privacy rights of individuals must cede, in a proportionate way, to achieve a legitimate objective. Approval, in consultation with the Buildings & Estates Manager, will depend on a proven need, taking into account whether better solutions exist and the benefits to be gained from the additional cameras.

12.0 Procedure for Removal of CCTV Cameras

Where evidence shows that a CCTV camera location is no longer justified, the camera shall be removed at the request of the CCTV administrator and placed in storage until required.

13.0 Compliance with this Policy

All employees who are responsible for implementing, managing, operating or using the CCTV system must do so only as authorised and in accordance with this Policy. Any failure to comply with this Policy may be a disciplinary offence.

14.0 Supporting Documents

This policy should be read in conjunction with other Institute policies, including:

- GMIT Data Protection Policy

The above list is not exhaustive and other policies may apply.



CCTV REQUESTS SUBJECT ACCESS REQUEST FORM

DETAILS OF REQUESTER

Name: _____

Address: _____

Email Address: _____ Tel Number: _____

DETAILS OF REQUEST

Under Article 15 of the GDPR, I request CCTV access as follows:

View CCTV footage Copy of CCTV footage

Reason for request: _____

Date of recording: _____ Time of recording: _____

Start Download (time): _____ End Download (time): _____

Location of recording: _____

I acknowledge that, before I am given access to personal information about myself, I may be asked for ID.

I acknowledge that I will not normally be given access to the personal information of another person unless I have obtained the written consent of that person.

Signed: _____ Date: _____

Completed forms to: Campus CCTV Administrator

Galway campus & CCAM - Corinna Gavin cctv@gmit.ie Mayo campus - Anne Donnelly anne.donnelly@gmit.ie

Office Use Only	Date	Time	Who By
System Download Requested:			
Evidence/Authenticate:			
Result:			
Copied to Memory Stick:			
Download Failed Report:			

No of Copies Made		B&E Ref No:	
Copy 1 Given To:		Date Given:	
Copy 2 Given To:	0	Date Given	
Copy 1 Received Back:		Date	
Copy 2 Received Back:		Date	
No of Still Photos:	0	Date retained copy deleted	
Copies Given To:		Date:	

Signed: _____ Date: _____



CCTV REQUESTS THIRD PARTY ACCESS REQUEST FORM

DETAILS OF THIRD PARTY

Name: _____

Address: _____

Garda Badge No: (where appropriate): _____

Email Address: _____ Tel Number: _____

DETAILS OF REQUEST

I request CCTV access as follows:

View CCTV footage Copy of CCTV footage

Reason for request (tick as appropriate):

- Per Section 10.2.1 of this policy (An Garda Síochána only)
- Per Section 10.2.2 of this policy for one of the purposes outlined in Section 5.0

Date of recording: _____ Time of recording: _____

Start Download (time): _____ End Download (time): _____

Location of recording: _____

Signed: _____ Date: _____

Completed forms to: Campus CCTV Administrator

Galway campus & CCAM - Corinna Gavin cctv@gmit.ie

Mayo campus - Anne Donnelly anne.donnelly@gmit.ie

Office Use Only	Date	Time	Who By
System Download Requested:			
Evidence/Authenticate:			
Result:			
Copied to Memory Stick:			
Download Failed Report:			

No of Copies Made		B&E Ref No:	
Copy 1 Given To:		Date Given:	
Copy 2 Given To:	0	Date Given	
Copy 1 Received Back:		Date	
Copy 2 Received Back:		Date	
No of Still Photos:	0	Date retained copy deleted	
Copies Given To:		Date:	

Signed: _____

Date: _____