



Title – CCTV Policy Griffith College Limerick

INTRODUCTION

Closed Circuit Television Systems (CCTVS) are installed in Griffith College. This Policy sets out the purpose, scope and use of CCTV systems at the **Griffith College Limerick Campus**.

The campus is located at:

**O'Connell Ave,
Limerick City.**

1. PURPOSE OF POLICY

***“The purpose of this policy is to regulate the use of Closed-Circuit Television and its associated technology in the monitoring of both the internal and external environs of the Griffith College Limerick campus, premises and grounds.*”**

CCTV systems are installed (both internally and externally) on campus for the purpose of enhancing security of the building and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or in the external environs of each of our four campuses and buildings during both the daylight and night hours each day. CCTV surveillance at Griffith College Limerick is intended for the purposes of:

- protecting the College buildings and College assets, both during and after College hours;
- promoting the health and safety of staff, learners and visitors;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the Gardai in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders;
- ensuring that College rules are respected so that the College can be properly managed.

2. SCOPE

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

3. GENERAL PRINCIPLES

Griffith College and all its companies and corporate bodies have a statutory responsibility for the protection of its property, equipment and other plant as well as providing a sense of security to its staff, learners and residents and invitees to its premises. Griffith College owes a duty of care under the provisions of the Safety, Health and Welfare at Work Acts and associated legislation and utilises CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of



enhancing the quality of life of the College community by integrating the best practices governing the public and private surveillance of its premises.

The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring staff attendance or performance.

Any requests for CCTV recordings/images from An Garda Síochána will be fully documented and advice will be sought if any such request is made. (See "Access" below). If a law enforcement authority, such as An Garda Síochána, is seeking a recording for a specific investigation, An Garda Síochána may require a warrant and accordingly any such request made by An Garda Síochána should be requested in writing and the College will immediately seek advice. An Garda Síochána will be permitted to pre-view the footage to ascertain its evidentiary value. The policy is applied where they require a copy of specific footage.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the College, including Equality & Diversity Policy, Dignity at Work Policy, Data Protection Policy, Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other educational and related legislation.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.

Video monitoring of public areas for security purposes within the College campus and buildings is limited to uses that do not violate the individual's reasonable expectation to privacy.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the College. Recognisable images captured by CCTV systems are "personal data." They are therefore subject to the provisions of the Data Protection Acts

4. JUSTIFICATION FOR USE OF CCTV

The General Data Protection Regulation (GDPR) and the Data Protection Acts require that data is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that Griffith College needs to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV to control the perimeter of the College's buildings for security purposes has been deemed to be justified by the board of directors. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

CCTV systems will not be used to monitor staff attendance or performance or learners lecture room activity, in the College.

In other areas of the College where CCTV has been installed, e.g. Lorrigan's Lane, the board of directors have demonstrated that there is a proven risk to security and/or health & safety and that the installation of CCTV is proportionate in addressing such issues that have arisen prior to the installation of the system.

5. LOCATION OF CAMERAS

The location of cameras is a key consideration, the College will not monitor areas where individuals would have a reasonable expectation of privacy. Griffith College has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals. Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property. Where passers-by are inadvertently recorded, their images will be redacted / anonymised where that footage is required by the authorities – e.g. Gardai – for evidentiary purposes.

CCTV Video Monitoring and Recording of Public Areas on the College campus may include the following:

- **Protection of College buildings and property:** The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, receiving areas for goods/services
- **Monitoring of Access Control Systems:** Monitor and record restricted access areas at entrances to buildings and other areas
- **Verification of Security Alarms:** Intrusion alarms, exit door controls, external alarms
- **Video Patrol of Public Areas:** Main entrances / exit gates and fire exits
- **Criminal Investigations (carried out by An Garda Síochána):** Robbery, burglary and theft surveillance

6. COVERT SURVEILLANCE

Griffith College does not engage in covert surveillance of any type.

The most up to date information on CCTV and surveillance in the workplace is available at the following link on Citizens Information website -

https://www.citizensinformation.ie/en/employment/employment_rights_and_conditions/d ata_protection_at_work/surveillance_of_electronic_communications_in_the_workplace.html

Where An Garda Síochána requests to carry out covert surveillance on College premises, such covert surveillance may require the consent of a judge. Accordingly, any such request made by An Garda Síochána will be requested in writing and the College will seek advice.

7. NOTIFICATION – SIGNAGE

The College will provide a copy of this CCTV Policy on request to staff, learners and visitors to the College. This policy will also be published on the College's data protection web pages.

This policy describes the purpose and location of CCTV monitoring, a contact number for those wishing to discuss CCTV monitoring and guidelines for its use. Adequate signage will be placed at the entrance of each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation. Signage shall include the name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location.

Appropriate locations for signage will include:

- at entrances to premises i.e. external doors, College/Campus entrance
- reception area

See Appendix 2 'CCTV Signage' of this document for detail

8. STORAGE & RETENTION

The Data Protection Acts state that data "shall not be kept for longer than is necessary for" the purposes for which it was obtained. The campus's retention period for CCTV security system is 30 days, except where the images identify an issue – such as a break-in or theft and those particular images/recordings are retained specifically in the context of an investigation/prosecution of that issue.

The retention period of 30 days may be exceeded at the request of Gardaí in relation to an ongoing investigation.

Accordingly, the images captured by the CCTV system will be retained for a maximum of 30 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel.

Supervising the access and maintenance of the CCTV System is the responsibility of the Head of the Griffith College campus Limerick. In the absence of the Head of the Griffith College campus Limerick, the Deputy Head should take responsibility. Where applicable, the Head of the Griffith College campus Limerick may delegate, in exceptional situations, their responsibilities to other persons (e.g. Pádraig O'Regan and Milena Roweder). In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above (such individuals may include the Gardaí or other members of the staff, subject to pre-written approval by a Director of Griffith College or a member of the DPO lead team in the College).



Where it is established the footage relates to a tenant or partner institution on the Limerick campus, further access to the footage will be subject to pre-written approval by a Director of Griffith College and a Director of the tenant / partner institution.

When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

A quarterly report will be supplied to dpo@griffith.ie outlining the number of viewings of CCTV footage each quarter, commencing 1st October 2022.

9. ACCESS

DVRs storing the recorded footage and the monitoring equipment will be securely stored and password protected. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel. A log of access to recordings/images will be maintained.

Access to the CCTV system and stored images will be restricted to authorised personnel only i.e. the Head of the Griffith College campus Limerick and others as outlined in clause 8 of this document.

In relevant circumstances, CCTV footage may be accessed:

- By An Garda Síochána where the College (or its agents) are required by law to make a report regarding the commission of a suspected crime; or
- Following a request by An Garda Síochána when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on the College campus, or
- To the HSE and/or any other statutory body charged with child safeguarding; or
- To assist the board of directors in establishing facts in cases of an allegation of gross misconduct, disciplinary matter or investigation, or
- To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to the Data Protection Officer, or
- To individuals (or their legal representatives) subject to a court order, or
- To the College's insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property, or
- To HR as part of an investigation regarding an allegation of gross misconduct or other disciplinary matter, or
- To HSA (Health & Safety Authority) to assist with the investigation of a work place incident, accident or fatality.

Requests by An Garda Síochána: Information obtained through video monitoring will only be released when authorised by the Head of the Griffith College campus Limerick, following consultation with the Data Protection Officer. If An Garda Síochána request CCTV images for a specific investigation, An Garda Síochána may require a warrant and accordingly any such request made by An Garda Síochána should be made in writing and the College should immediately seek advice.

Access requests: On written request, any person whose image has been recorded has a right to be given a copy of the information recorded which relates to them, provided always that such an image/recording exists i.e. has not been deleted and provided also that an exemption/prohibition does not apply to the release. Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised so that the other person is not identified or identifiable.

To exercise their right of access, a data subject can make an application in writing to the College's Data Protection Officer or by email to dpo@griffith.ie and the College must respond within 30 days.

A person should provide all the necessary information to assist the Data Protection Officer in locating the CCTV recorded data, such as the date, time and location of the recording. If the image is of such poor quality as not to clearly identify an individual, that image may not be considered to be personal data and may not be handed over by the College.

In giving a person a copy of their data, the College may provide a still/series of still pictures, with relevant images. However, other images of other individuals will be obscured before the data is released.

10. RESPONSIBILITIES

The Head of the Griffith College campus Limerick will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by the College.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the college campus
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at the College is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Maintain a record of access (e.g. an access log) to or the release of any material recorded or stored in the system
- Ensure that monitoring recordings are not duplicated for release
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally



- Provide a list of the CCTV cameras and the associated monitoring equipment and the capabilities of such equipment.
- Approve the location of temporary cameras to be used during special events that have particular security requirements and ensure their withdrawal following such events.
- Give due consideration to both learners and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the College and be mindful that no such infringement is likely to take place
- Co-operate with the Health & Safety Officer in reporting on the CCTV system in operation in the College
- Advise that adequate signage at appropriate and prominent locations is displayed as detailed above and in Appendix 2 of this document
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of “Reasonable Expectation of Privacy”
- Ensure that monitoring DVRs are stored in a secure place with access by authorised personnel only through password protection.
- Ensure a quarterly report is supplied to dpo@griffith.ie outlining the number of viewings of CCTV footage, each quarter, commencing 1st October 2022.
- Ensure that images recorded on DVRs/digital recordings are stored for a period not longer than 30 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Data Protection Officer.
- Ensure that when a zoom facility on a camera is being used, ideally there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual’s reasonable expectation of privacy in public areas
- Ensure the cameras are not recording audio

11. IMPLEMENTATION & REVIEW

The policy will be reviewed and evaluated from time to time. On-going review and evaluation will take cognisance of changing information or guidelines (e.g. from the Data Protection Commissioner, An Garda Síochána, legislation and feedback from, learners, staff and others.

The date from which the policy will apply is the date of adoption by the Board of Directors. Implementation of the policy will be monitored by the Head of the Griffith College campus Limerick.



APPENDIX 1 - DEFINITIONS

Definitions of words/phrases used in relation to the protection of personal data and referred to in the text of the policy;

CCTV – Closed-circuit television is the use of video cameras to transmit a signal to a specific place on a limited set of monitors. The images may then be recorded on video tape or DVD or other digital recording mechanism.

Griffith College Campuses – there are three Griffith College campuses located at:

1. Griffith College Dublin, South Circular Road, Dublin 8
2. Griffith College Cork, Wellington Road, Cork
3. Griffith College Limerick, O'Connell Avenue, Limerick City

The Data Protection Acts – The Data Protection Acts 1988, 2003 and 2018 confer rights on individuals as well as responsibilities on those persons handling, processing, managing and controlling personal data. All College staff must comply with the provisions of the Data Protection Acts when collecting and storing personal information. This applies to personal information relating both to staff of the organisation and individuals who interact with the organisation

Data - information in a form that can be processed. It includes automated or electronic data (any information on computer or information recorded with the intention of putting it on computer) and manual data (information that is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system).

Personal Data – Data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.

Access Request – this is where a person makes a request to the organisation for the disclosure of their personal data under Section 3 and/or section 4 of the Acts.

Data Processing - performing any operation or set of operations on data, including:

- Obtaining, recording or keeping the data,
- Collecting, organising, storing, altering or adapting the data,
- Retrieving, consulting or using the data,
- Disclosing the data by transmitting, disseminating or otherwise making it available,
- Aligning, combining, blocking, erasing or destroying the data.

Data Subject – an individual who is the subject of personal data.

Data Controller - a person who (either alone or with others) controls the contents and use of personal data.

Data Processor - a person who processes personal information on behalf of a data controller, but does not include an employee of a data controller who processes such data in the course of their employment, for example, this might mean an employee of an organisation to which the data controller out-sources work. The Data Protection Acts place responsibilities on such entities in relation to their processing of the data.

Head of the Griffith College Limerick campus – Kate Harrold – Contact

kate.harrold@griffith.ie

APPENDIX 2 – CCTV Signage

The site-specific CCTV Signage for Griffith College Limerick

24hr CCTV

CCTV cameras in operation

Images are being monitored and recorded for the purpose of crime-prevention, the prevention of anti-social behaviour, for the safety of our staff, learners, guests and for the protection of Griffith College and its property.

This system is in operation 24 hours a day, every day. CCTV recordings are retained for 30 days. These images may be passed to An Garda Síochána.

This scheme is controlled by the College. For more information contact 061 310031 or email info.gcl@griffith.ie or dpo@griffith.ie