

Dundalk IT CCTV Policy / Data Policy

Introduction

Closed circuit television (CCTV) system has been installed in many buildings and on the grounds of Dundalk Institute of Technology. The system comprises of 29 number external cameras and 64 number internal cameras. The cameras cover the main entrance of the Whitaker Building, Regional Development Centre Building, North Building ,PJ Carrolls Building (North Entrance and South Entrance) ,Muirhevna Building, Restaurant Building, Faulkner Building (East Entrance adjacent to the Student Services office and East entrance adjacent Hospitality Goods Inwards), South Building (East Entrance) and DkIT Sport Building (Main Entrance). Each of these entrances has two cameras placed in such a position as to view and record persons entering the building and egressing the building at these points. At the three main campus vehicular entrances,(Dublin Road, Hoey's Lane and Pj Carroll's) and the main vehicular entrance at the DkIT Sport Building Campus,1 Camera will view and record vehicles as they enter and leave the campus. There are a small number of cameras placed at other locations near campus buildings.

Due to recurrent funding limitations it is not possible to have CCTV everywhere on Campus including in or near every Campus Building.

These are the only areas to be covered; it is not intended to cover Emergency Fire Exit Doors as these doors are only used for exit in an emergency and it is not intended to provide CCTV cover in car parks or bicycle sheds.

The cameras are fully operational and are either fixed cameras or cameras with pan, tilt and zoom facilities (PTZ). Images are color and a mixture of Standard Definition (SD) and High Definition (HD). The system is operated from a main control center in room NE102 in the North Building and can be viewed from a secondary control station at P1002 in the Pj Carroll's Building, these control rooms are linked using a separate fiber link from the main Campus Network.

CCTV Strategy

Fixed Position Cameras

Fixed position cameras will remain in one fixed position only.

PTZ Dome Cameras

It is intended to have all of the PTZ cameras in one fixed position only. The PTZ feature can still operate and should an operator move a camera from its fixed position these have been pre-programmed to return to the fixed position after a period of 1 min of no use.

A small number of PTZ cameras will remain on tour, this is the better option for these cameras at the moment. These external cameras are listed as follows: X11, X14, X15, and X17.

Definitions

Data Controller – a person who, either alone or with others, controls the contents and use of personal data; i.e. Dundalk Institute of Technology, Dublin Road, Dundalk.

Data Processors – a person who processes personal data on behalf of a data controller but does not include an employee of the data controller who processes such data in the course of his employment; ie: Moran CCTV, Unit 10A, North Link Business Park, Coes Road, Dundalk, Co. Louth. (PSA License no. 03242)

Note: Over the course of time, the Data Processors may change and this document will be updated to reflect any change.

Objectives of the CCTV System

The objectives of the CCTV as determined by the Data controller and which form the lawful basis for the processing of data are:-

- The Safety, Health & Welfare of staff, patrons and visitors to the Institute is a legislative responsibility for the Institute. CCTV will assist in achieving success with this requirement.
- The protection of Institute property from theft or damage is a responsibility of the Institute. CCTV will assist in achieving this requirement.
- To help deter and detect crime and provide evidential material to assist with the investigation of a crime.

General principles of operation

The information obtained by CCTV is controlled in accordance with the Data Protection Acts 1988 & 2003. Signage (as shown below) has been placed throughout the Institute buildings and grounds to inform users of the Institute that CCTV is in operation. These signs give a contact telephone number for persons wishing to discuss the processing of CCTV information.



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

Storage and retention

Section 2(1) (c) (iv) of the Data Protection Act states that data 'shall not be kept longer than is necessary for' the purposes for which it is obtained. The Institute currently uses a hard drive system to record images and images are retained for no longer than 32 days, except where the recorded image identifies an issue – such as a break-in or theft – and is retained specifically in the context of an investigation of that issue.

Supply of data to An Garda Siochana

If the Gardaí require CCTV footage for a specific investigation, the Institute (or security company acting on behalf of the Institute) must satisfy itself that there is a genuine investigation underway. For practical purposes, a phone call to the requesting Garda's station may be sufficient, provided that you speak to a member in the District Office, the station sergeant or a higher ranking officer. The date, time and all other details of the conversation should be recorded in the daily log book.

Access requests

Any person whose image has been recorded has a right to be given a copy of the recorded image. To exercise that right an application should be sent through the Data Protection Office at the Institute. Contact Officer is Loretto Gaughran loretto.gaughran@dkit.ie

Practically, a person must provide necessary information by detailing information such as the date, time, location and duration of the recording. They should also provide a passport sized photograph of themselves. Where the image is of such poor quality as does not clearly identify an individual that image will not be considered to be personal data. In giving a person a copy of his/her data, the data controller may provide a series of still pictures, or a copy of the captured recording. However, other people's images should be obscured before the data is released. As per the General Data Protection Regulation of 25 May 2018 no fees are applicable for access to personal data.

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

This information will be forwarded via the Data Compliance Officer.

Responsibility of security companies

As from May 2007 the Institutes CCTV systems is operated by Moran CCTV and are considered to be 'Data Processors'. As data processors, Moran CCTV operates under the instruction of data controllers (Dundalk Institute of Technology) and is bound by section 2(2) and 2C of the Data Protection Acts.

Data processors are obliged to have appropriate security measures in place to prevent unauthorized access to, or unauthorized alteration, disclosure or destruction of the data and against all unlawful forms of processing. Therefore access controls have been placed on image storage and remote access to live recording is password encrypted.

A copy of the Institutes CCTV policy has been forwarded to Moran CCTV. Security Staff will be suitably trained and are aware of their obligations relating to the security of data. Members of the Institute community will not have access to the Control centre without an authorized member of Staff being present.

Authorized persons are listed below.

1. Henry Mc Loughlin (Head Caretaker)
2. All Caretaking Staff.
3. Noel Ward (Estates Office)