



Code: **QA170 Closed Circuit Television (CCTV) Systems**
Title: **Closed Circuit Television (CCTV) Policy**
Date: 14.05.19
Approval: SSC

1.0 Policy Statement

NUI Galway has a statutory responsibility to protect the security and safety of all students, staff, visitors and contractors whilst on University premises. All personal data processed will be done in accordance with relevant legislation and in accordance with the NUI Galway Data Protection Policy. NUI Galway is the Data Controller of the personal data collected. The personal data collected will include images and movements of NUI Galway students, staff, visitors, contractors and private individuals. The use of Closed-Circuit Television (CCTV) systems is an integral and deemed justified part of enhancing the safety and security of the NUI Galway campus. The use of the CCTV system is 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. Its use will be to achieve the aims and legitimate objectives in this regard and as deemed necessary by NUI Galway and for the purposes of:

- protecting the Campus buildings and Campus assets, both during and after core hours
- promoting the health and safety of staff, students and visitors
- reducing the incidence of crime and anti-social behavior (including theft and vandalism)
- supporting the Gardai in a bid to deter and detect crime
- assisting in identifying, apprehending and prosecuting offenders
- as an ancillary use, staff or student monitoring will only take place in the event of a specific incident that requires investigation under a University Policy, Procedure or Code
- protecting health and safety, security, crime prevention and legal affairs health at NUI Galway Student accommodation

2.0 Scope

This policy applies to the use of CCTV systems across all areas of the NUI Galway campus, both internal and external on the main NUI Galway city campus and on all out-lying campus areas.

3.0 General Principles

- To comply with the Data Commissioner's recommendations in relation to data protection.

- Monitoring of footage will be conducted in an ethical, legal and professional manner as deemed necessary by NUI Galway and in compliance with the relevant legislation.
- In the event of an incident being reported to the NUI Galway Security Office, the footage of the identified location is reviewed by the Security Office and addressed under the Data Commissioner's recommendations.
- Only on receipt of an official request in writing from the Garda Síochána will a copy of the footage be released.
- Private Citizens (Data Subjects) can apply to the Security Office for a copy of footage under the Data Protection Act 2018 and under applicable NUI Galway Data Protection Policies and Procedures available on the University Data Protection website.
- Private Citizens (Data Subjects) can avail of their other data protection rights under applicable NUI Galway Data Protection Policies and Procedures (available on the NUI Galway website) by contacting the University Data Protection Officer at dataprotection@nuigalway.ie.
- Private Citizens (Data Subjects) can make a complaint to the Data Protection Commissioner through the following link: <https://www.dataprotection.ie/en/contact/how-contact-us>
- Access to the CCTV servers is restricted to the NUI Galway Director of Physical Resources, Head of Facilities Management and Services and the Supervisor of Security or an appointee. There will be a GDPR compliant written contract with installation and maintenance contractors. The following applies to such contract: The contractor has a written contract with the security company in place which details the areas to be monitored, how long data is to be stored, what the security company may do with the data, what security standards should be in place and what verification procedures apply. The written contract also states that the security company will give NUI Galway all reasonable assistance to deal with any subject access request made under Article 15 of the General Data Protection Regulation which may be received by NUI Galway within the statutory time-frame (generally one calendar month).
- Security companies that place and operate cameras on behalf of NUI Galway are considered to be "Data Processors." As data processors, they operate under the instruction of NUI Galway. Article 32 of the General Data Protection Regulation places a number of obligations on data processors. These include having appropriate security measures in place to prevent the destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed, in particular where the processing involves the transmission of data over a network and against all unlawful forms of processing. This obligation can be met by having appropriate access controls to image storage or having robust encryption where remote access to live recording is permitted. Staff of the security company have been made aware of their obligations relating to the security of data.
- NUI Galway may also where required under its legitimate interests having regard to health and safety, security, crime prevention and legal affairs matter share and give access to CCTV footage to Campus Living Limited (as may be amended) who operate accommodation and commercial services on behalf of NUI Galway.

4.0 Right (legal basis) to use Personal Data

In order for it to be legal and appropriate for the University to process personal data under its CCTV processing the University processes such personal data in some cases where it is necessary due to a **legal obligation** for example under the Universities Act 1997, a criminal investigation or a Health and Safety at Work issue under the Health and Safety at Work Act 2005 and in the remainder of cases of processing it is necessary for the **legitimate interests** of the University based on the purposes set out in this policy.

5.0 Recording & Retention

The CCTV system installed at the University premises uses digital recording technologies only. Recordings are made directly to hard disc and are retained for approximately one month, or as deemed necessary by NUI Galway. In the event of an ongoing Garda Síochána investigation the data will be retained until such time as the case is complete.

6.0 Responsibilities

- **Security Services Supervisor**
 - Ensure that the use of CCTV systems and the monitoring of all footage are carried out in accordance with this policy.
 - Ensure that all monitoring is in compliance with any relevant legislation relating to privacy.
 - Ensure that only authorised individuals have access to footage and only as necessary.
 - Oversee the use of CCTV monitoring for safety and security purposes across NUI Galway Campus and it's satellite buildings where available
 - Co-ordinate viewing and release of any footage with the parties involved, i.e. Garda Síochána
 - Maintain a record of the release of any footage
 - Ensure that any required signage is correct and in place, including information on how to contact the individuals responsible for the system and footage and details of the Data Controller.

7.0 Implementation & Review

The policy will be reviewed as required in light of any legislative or other relevant developments, taking cognisance of changing information or guidelines from the Data Protection Commissioner, An Garda Síochána, and the internal policies of NUI Galway.