

PROVIDER NAME: CCT College Dublin (CCT)			
POLICY AREA: Standard 10: Information Management			
Policy and Procedure Title:	CCTV Policy	Document Number: CCTP1004	Version: 1.0
<p>CCT College Dublin operates monitored closed circuit television (CCTV) on its campus premises. The purpose of the following policy and procedures is to outline the CCTV operation in accordance with data protection legislation (GDPR), and specifically the legal basis for its operation and the access, use, storage, sharing and deletion of CCTV materials.</p> <p>This policy should be read in conjunction with the College Data Protection Policy and Privacy Statement.</p> <p>CCT College Dublin utilises monitored CCTV cameras at its Westmoreland Street Campus, with cameras installed at all entry / exit points and various locations throughout the building. The CCTV system is monitored live, during opening hours, and also records footage with associated, date, time and location.</p> <p>The use of CCTV cameras is indicated upon entry to the building, within staff and student handbooks and at locations throughout the building.</p> <p>Responsibility for the CCTV falls to the Dean for Administration and Finance with data protection oversight from the Dean of Academic Affairs. Authority to access CCTV is strictly controlled by the Dean for Administration and Finance.</p> <p>CCTV footage is the property of CCT College Dublin and is considered personal data under the College Data Protection Policy.</p> <p>The College operates a CCTV system for the following purposes:</p> <ul style="list-style-type: none"> • The provision of safety and security of staff, students, visitors, buildings and facilities • The prevention, investigation and detection of a criminal allegation or offence or breach / alleged breach of College regulations / Code of Conduct • Enabling identification, apprehension and prosecution of offenders in association with law enforcement agencies, as appropriate • Supporting the College in pursuing or defending claims • Enabling the College to respond to legitimate requests from third parties for CCTV footage, where there is a legal basis for providing same • Supporting the academic integrity of examinations and examination processes. <p>In implementing CCTV cameras that College has sought to balance the legitimate interests of the College with the rights and freedoms of data subjects. As a result cameras are not placed in individual offices or hygiene facilities and are not used for the purpose of monitoring staff.</p> <p>CCT College Dublin does not commit to securing footage of all incidents and eventualities.</p>			

Procedure Outline / Method(s) used to carry out this procedure

Responsibility of

Evidence generated by this procedure to ensure its effectiveness

CCTV Operation and Monitoring

The Dean for Administration and Finance is authorised to operate and monitor the CCTV system and designate responsibility to other personnel based on the legitimate need i.e. fulfilment of security duties.

As standard, those personnel responsible for front of house / security have access to CCTV for live monitoring.

Access to recorded CCTV footage is controlled by the Dean for Administration and Finance and is only accessed when specific information is provided in accordance with the purposes for the implementation of CCTV or in response to a data subject access request. In the case of the latter, access will only be facilitated where to do so does not compromise the privacy of other data subjects.

The Dean for Administration and Finance will ensure all CCTV monitoring personnel are briefed on their obligations and responsibilities and the legal requirements in respect of CCTV monitoring and the reporting of incidents.

All personnel approved for monitoring CCTV are responsible for ensuring appropriate and legal use of the system.

CCTV Recordings Retention

In accordance with best practice guidelines, CCT College Dublin will not retain CCTV recordings for a period of more than 9 days, except where the material has been identified as being material to a claim, dispute or allegation, in which case it will be retained securely until such a time as any associated process concludes, including any appeal period.

The Dean for Administration and Finance is responsible for the secure storage of CCTV recordings and will specifically document any recording required to be retained as evidence.

Where recorded footage is to be retained, the Dean for Administration and Finance will download the specific recording and store it securely in a secure location. It will be retained until the associated process and any opportunity for appeal has concluded or until an appropriate authority advises it is no longer required. A record of the date of destruction, mode of destruction and reason for destruction will be retained.

Requests for Access to CCTV Recordings

Access to CCTV footage is controlled by the Dean for Administration and Finance including in the case of a data subject access request, in which case the request comes through the Dean of Academic Affairs.

Dean for Admin & Finance

Dean for Admin & Finance

Assigning of authorised access / restrictions on access

Provision of staff training / briefings
Signed declarations of understanding

Availability of recordings

Register of footage to be retained

Secure storage arrangement

Data subject access requests will consider the rights and freedoms of all data subjects in any recorded footage and access will only be facilitated where individual rights and freedoms are not compromised.

Requests under Data Subject Access requests must be made in writing in accordance with the policy and procedure for Data Subject Access Requests.

Access requests from law enforcement agencies, senior managers or other parties should be addressed to the Dean for Administration and Finance clearly stating the rationale for the access request. The Dean will consider the legal basis for the request in the context of this policy, the Data protection Policy and the purposes for the use of CCTV recording. Where the requests pertains to a specific incident, to ensure access is still possible, requests should be made within 4 calendar days of the specific incident.

Any disclosure of CCTV recordings will be in compliance with GDPR.

Additional Information

Any questions, complaints or further information required in respect of this policy and procedures should be directed to the data protection contact – the Dean of Academic Affairs, CCT College Dublin, 30-34 Westmoreland Street, Dublin 2 or by email to njackson@cct.ie

CCT College Dublin reserves the right to seek legal counsel in respect of this policy and implementation of these procedures.

Dean for Admin & Finance, Dean of Ac. Affairs

Dean for Admin and Finance

Dean for Academic Affairs

Records of requests

Access requests

Communication records

Monitoring		
Monitor (Job Title)	Frequency	Monitoring Method(s)
Dean of Academic Affairs Dean for Admin and Finance	Annually or more frequently as required	Review of access requests Review of complaints Records of staff briefings and declarations

POLICY CONTROL SHEET

Policy Title	CCTV Policy
Responsible Officer(s)	Dean for Admin & Finance, Dean of Academic Affairs
Issuance Date	May 2018
Effective Date	May 25 th 2018
Last Review Date	N/A
Supersedes	New policy
Next Review Date	August 2019
Designated Reviewer	Dean for Admin and Finance, Dean of Academic Affairs
Scope	All staff and stakeholders

Revision History

Revision	Approval Date	Revision Description	Originator	Approved By
New Policy	May 2018	New CCTV policy for GDPR compliance	Senior Management Team	Academic Council

References upon which the Policy section is based

CCT Policy area	Information Management
Statutory & System Wide Basis	The Irish Qualifications and Quality Assurance (Education and Training) Act, 2012; QQI Core Statutory Guidelines for Quality Assurance EU GDPR
Related CCT Policies / Forms	CCTP1001 Privacy Statement CCTP1002 Data Protection Policy CCTP1003 Data Access Request Policy CCTP1005 Information Management Policy

