



Mardyke Arena

UNIVERSITY COLLEGE CORK

Closed Circuit Television (CCTV) System

Policy & Guidelines



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1. Introduction

This policy relates to the use of Closed-Circuit Television (CCTV) Systems both internally and externally in the Mardyke Arena UCC, Mardyke Walk, Western Road, Cork T121NFK.

CCTV is a technology that uses video cameras to transmit signals to a specific place but does not transmit publicly.

CCTV systems are generally used to conduct surveillance for security for health and safety purposes. They capture images that may identify individuals either directly or indirectly by recording for example vehicle registration numbers or distinctive items of apparel.

A copy of this CCTV policy is available on the Mardyke Arena website / Mardyke Arena Staff WorkVivo Space.



2. Purpose of the Policy

The purpose of this policy is to regulate the use of Closed-Circuit Television Systems, i.e., CCTV and its associated technology in the monitoring of both the internal and external environs of the premises under the remit of the Mardyke Arena UCC.

3. Scope

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



4. Justification for use of CCTV

Article 5(1)(c) of the General Data Protection Regulation (the “GDPR”) requires that data are “*adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed*”.

The following are the purposes that the MARDYKE ARENA UCC has deemed to be justified to obtain and use Personal Data by means of a CCTV system:

- Protect the building, assets, and information of the MARDYKE ARENA UCC during and outside of operational hours.
- Promote health and safety of MARDYKE ARENA UCC staff and visitors to the MARDYKE ARENA UCC buildings.
 - Deter and detect crime.
 - Assist in investigating security incidents.
 - In exceptional circumstances and where it is considered appropriate, CCTV material or images may be used to visually monitor visitors or staff members. Such exceptional circumstances could include, for example, where an accident or incident has taken place or in the case of a staff member(s) where there is an alleged breach of the Disciplinary Policy. This policy prohibits CCTV monitoring for any other purpose other than that set out above.

Furthermore, it is limited to uses that do not violate the *reasonable expectation to privacy* as defined by law. Collection, storage and use of CCTV footage will adhere to the data privacy principles set out in the General Data Protection Regulation (GDPR) and the Data Protection Acts, 1988 to 2018.

4. 1 Operation of System

MARDYKE ARENA UCC CCTV systems can only be accessed and are maintained by authorised personnel from the UCC IT or associated maintenance contractors and or designated management the MARDYKE ARENA UCC. The recordings are password protected and the system is housed in a secure locked office with restricted access.

All cameras operate 24 hours a day 7 days a week. Cameras are positioned so they only monitor areas intended to be covered by the equipment.

The CCTV system records digital images and any movement detected in the area under surveillance together with data about time, date, and camera location.



The equipment and recording media are checked or “serviced” on a regular basis to ensure the quality of the images, camera and recording function.



4.2 Location of Cameras

The CCTV cameras will be located at various locations throughout the building and external surrounds to ensure the safety and security of all patrons and staff of the MARDYKE ARENA UCC.

4.3 Signage

In compliance with the *Lawfulness, Fairness and Transparency Principle* [Article 5, clause 1(a)] of the General Data Protection Regulation (the “GDPR”), individuals (or “Data Subjects”) whose images may be captured on MARDYKE ARENA UCC CCTV cameras must be made aware of MARDYKE ARENA UCC recording activities. MARDYKE ARENA UCC do this through CCTV Signage which is placed in prominent locations throughout the premises.

Signage includes details relating to:

- MARDYKE ARENA UCC **Identity** – i.e., informing you that the MARDYKE ARENA UCC is recording your image (i.e., MARDYKE ARENA UCC are the Data Controller).
- **Contact Details** – how you can contact MARDYKE ARENA UCC.
- An **Image of a Camera** – a picture image of a camera to focus your attention to the presence of the recording CCTV camera.

A copy of this CCTV policy will be available on MARDYKE ARENA UCC website and to any tenants of MARDYKE ARENA UCC.

4.4 Location of Signage

Signs are located in car parks, at the entrance to MARDYKE ARENA UCC, within the building, the office areas and in reception areas.



5. Storage and Retention

The Personal Data captured from MARDYKE ARENA UCC CCTV cameras are securely stored as electronic data.

Article 5.1(e) of the General Data Protection Regulation (GDPR) on Storage Limitations requires that Personal Data shall be “*kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are published.*”

The images captured by MARDYKE ARENA UCC CCTV system are retained for 30 calendar days.

It is important to note that in exceptional circumstances, images may be retained for longer time periods. This occurs where, for example an image captured on MARDYKE ARENA UCC CCTV systems identifies an incident that is subject to an investigation (e.g., an alleged crime has been captured by the CCTV footage and a copy of the footage has been requested by An Garda Síochána or/and other competent bodies for law enforcement purposes’. ‘Competent authority’ is defined at section 69 Data Protection Act 2018). In these cases, the CCTV images or “footage” will be retained until the investigation and all associated appeal processes have been concluded.



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6. Access and Requests for Information

Access to, and disclosure of CCTV images to third parties is strictly controlled and documented. This is to ensure that the rights of the individual(s) are maintained, and that the chain of evidence remains intact should the CCTV images be required for evidential purposes.

6.1 Who can access MARDYKE ARENA UCC CCTV images?

In relevant circumstances, CCTV footage recorded by MARDYKE ARENA UCC may be accessed by:

- An Garda Síochána, 'and other competent bodies for law enforcement purposes, ('Competent authority' is defined at section 69 Data Protection Act 2018), where the MARDYKE ARENA UCC is required by law or following a written request to make a report regarding a suspected crime or incident.
- Individuals whose images has been captured by MARDYKE ARENA UCC CCTV systems or requests on their behalf by their legal representative subject to a Court Order.
- Individuals whose images have been recorded by MARDYKE ARENA UCC CCTV systems and who have submitted a valid Subject Access Request (or "SAR") under the Data Protection Acts 1988 to 2018 or a valid Freedom of Information (or "FOI") Access Request under the Freedom of Information Act, 2014.
- The State Claims Agency as MARDYKE ARENA UCC's insurer where the footage is required to pursue a claim for damage done to the insured property.
- In exceptional circumstances, CCTV images may be used in the context of a formal internal investigation or disciplinary procedure concerning a staff member. In such cases, the disclosure of the image(s) may be used to assist in the investigation or prosecution of a sufficiently serious disciplinary matter or a criminal offence.

6.2 MARDYKE ARENA UCC Access and Disclosure Logging System or "Logs"

The following information will be retained by MARDYKE ARENA UCC where access to CCTV images or "copies of CCTV footage" recorded by our CCTV systems is provided.

- **Reason** for disclosure.
- Details of the **image disclosed** (i.e., the date, time, and location of the image).
- **Identity of the person** who released the CCTV image(s).
- Description of whether the **images were disguised/blurred** to prevent identification of individuals other than the data subject (i.e., the individual making the request for the CCTV footage). If it is not possible to sanitise or pixilate the images, MARDYKE ARENA UCC may contract an **external company** to assist with this exercise. These details will also be recorded.



6.3 Making an Access Request for a copy of your own Personal Data recorded by MARDYKE ARENA UCC CCTV systems

If you require access to your own Personal Data that has been recorded by MARDYKE ARENA UCC on CCTV systems, you should complete a *Subject Access Request Form* available on MARDYKE ARENA UCC website,

It is important that you provide as much detail as possible to assist MARDYKE ARENA UCC in complying with your access request.

The following information will be required:

- the **date** and **time** of when you reasonably think your image was recorded.
- any **other particulars to identify you** on the recorded image (e.g., your clothing or other details that will assist MARDYKE ARENA UCC in identifying you in the “footage”).

All decisions taken by MARDYKE ARENA UCC in relation to your Access Request will be clearly communicated to you.

If you request to view your own image as recorded by MARDYKE ARENA UCC CCTV systems, the viewing will take place in a private office and will be facilitated by MARDYKE ARENA UCC designated employees.



7. Making a Complaint

You can [Make a Complaint](#) to the [Data Protection Commission \(DPC\)](#) if you have concerns about how MARDYKE ARENA UCC process your Personal Data.

Prior to making a complaint to the [Data Protection Commission \(DPC\)](#) please contact MARDYKE ARENA UCC in the first instance to see if your query can be resolved.

You can do this by sending an e-mail to: dpomardyke@ucc.ie

Or by writing to MARDYKE ARENA UCC Data Protection Officer at:

Mardyke Arena UCC,
Mardyke Walk,
Cork
T12N1FK

8. Implementation and Review

MARDYKE ARENA UCC may update this policy from time to time.

If MARDYKE ARENA UCC make changes to this policy such changes will be identified by posting a notice on the MARDYKE ARENA UCC website.