

CCTV Video Monitoring and Recording Purposes Privacy Notice

Types of CCTV schemes

South Dublin County Council operate the following types of schemes:

- CCTV Surveillance on Council Premises and property
- Community CCTV Schemes
- Waste Enforcement related schemes
- Traffic Management

Purposes of processing

South Dublin County Council use CCTV livestream, video and similar surveillance technology recording systems that may be used by SDCC for the following purposes:

- To protect and safeguard the health and safety of Council staff, elected members, customers, visitors and contractors.
- To safeguard and protect the security of premises both internally and externally and the plant, equipment and property, parks, pavilions and cemeteries and all other assets under the ownership and remit of the Council.
- To assist in the maintenance of public order and safety in public places.
- To improve public and community safety and perception of safety by the local communities by assisting in the prevention, detection and investigation of offences, in turn assisting in the prosecution of offenders.
- To prevent, detect and investigate crime and illegal activities and in order to assist in the prosecution of offences Criminal Investigations by An Garda Síochána (AGS).
- Investigation by Council management of reported incidents/accidents and of suspected, or allegations of fraudulent behaviour or other activities consistent with this Policy.
- Investigations carried out by other agencies in relation to incidents, i.e. Health and Safety Authority, the Council's Insurers and or legal advisors.
- Raising awareness for members of the public interacting with staff on Council premises that their actions are being recorded in order to deter offences, e.g. assault and bodily harm.
- To help create a cleaner environment and public spaces by identifying and

- combating illegal dumping.
- To help with better traffic management and control, traffic counting and categorisation, traffic flow.
- For the purpose of safeguarding persons or property on SDCC premises or its environs

The legal basis of processing

The legal basis of processing for South Dublin County Council's use of CCTV systems to process personal data consists of one or more of the following:

- Article 6(1) (c) of the GDPR - the processing is necessary for compliance with a legal obligation to which South Dublin County Council is subject, e.g. Health, Safety & Welfare at Work Acts.
- Article 6(1) (e) of the GDPR and Part 5 of Data Protection Act 2018 (Law Enforcement Directive (LED)) - the processing is necessary for the performance of a task carried out in the public interest or in the exercise of an official authority vested in South Dublin County Council, e.g. - In relation to Community CCTV schemes the processing is necessary in the exercise of official authority vested in the Council as the joint controller under Section 38 of An Garda Síochána Act 2005, Data Protection Acts 1988-2018 (as amended).
- Article 6(1) (f) of the GDPR - the processing is necessary for the purposes of the legitimate interests pursued by South Dublin County Council (not relating to the Council's public tasks), e.g. in protecting its property and goods and maintaining the safety of persons using its buildings and environs.
- Waste Enforcement Act 1996, as amended (Section 14A) by the Circular Economy and Miscellaneous Provisions Act, 2022.
- Litter Pollution Act 1997, as amended (Section 23A) by the Circular Economy and Miscellaneous Provisions Act, 2022.
- The Local Authorities (Traffic Wardens) Act 1975

The sharing of CCTV

South Dublin County Council may, to fulfil statutory or regulatory obligations or in the public interest, from time to time, have to share personal data with other organisations or entities (in Ireland or abroad). Where this is required South Dublin County Council shall have regard to the security and integrity of the data, will minimise the data shared and will only be shared with third parties where the Council has a lawful basis to do so and only in accordance with the Council's CCTV policy.

The data may be shared with the following recipients:

- A Data Subject
- An Garda Síochána
- CCTV Officers of the Council
- Waste Enforcement Officers/Litter Wardens of the Council
- Other third parties where appropriate i.e. the Council's insurers and/or legal advisors
- Monitoring Service Provider and IT Support/Maintenance Providers
- Other parties where the data subject gives his/her consent or instructs us to do

Retention of data

Traffic monitoring data is live streamed and not retained.

Data recorded on CCTV systems shall be kept for no longer than is considered necessary in accordance with Article 5(1) (e) of the GDPR. CCTV footage will not be retained by South Dublin County Council beyond 28 days, except in circumstances where the data is required for evidential purposes and/or legal proceedings or in response to a data subject access request or where the Council has a legitimate interest, in which case it will be retained for longer than 28 days.

Further information

Further information can be found on [South Dublin County Council CCTV Policy](#)

Community CCTV schemes

Use of CCTV operated by South Dublin County Council as Data Controller under Community CCTV Schemes for the purpose of securing public order and safety in public places by facilitating the deterrence, prevention, detection and prosecution of offences by An Garda Síochána in the Killinarden and North Clondalkin areas.

Types of personal data

CCTV location, footage and stills.

Legal basis for the processing

Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in South Dublin County Council in accordance with Article 6(1) (e) of the General Data Protection Regulation, 2016.

Section 38(3) of the Garda Síochána Act 2005 – authorisation has been given by the Garda Commissioner for the installation and operation of CCTV by South Dublin County Council for the sole or primary purpose of securing public order and safety in public places by facilitating the deterrence, prevention, detection and prosecution of offences by An Garda Síochána.

Processing may also be facilitated under Part 5 of the Data Protection Act 2018, where necessary and proportionate.

Data shared with third parties (recipients of the data)

An Garda Síochána are joint controllers of the Community CCTV recordings and shall have access to the CCTV footage.