



GPA Global Privacy and Data Protection Awards 2025

Entry Form

To submit an entry to the GPA Global Privacy and Data Protection Awards, please complete and email this form to secretariat@globalprivacyassembly.org **no later than 16 June 2025**.

Note: GPA member authorities can submit as many entries as they wish, but a separate form should be used for each different entry, submitted by the deadline above.

Languages: The GPA documentation Rule 6.2¹ applies.

1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection

Authority:

Data Protection Commission

Gráinne Hawkes

Person completing this form:

First name

Last name

Deputy Commissioner, Head of International Affairs

Job title:

gxhawkes@dataprotection.ie

Email address:

2. ELIGIBILITY

By submitting this entry, I confirm that (*please tick all boxes to confirm*):

- ☒ The Authority is a member of the Global Privacy Assembly
- ☒ The initiative described in this entry was undertaken before 16 June 2025.
- ☒ I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the GPA Secretariat.

3. CATEGORIES

Please indicate which category you wish to enter.

*Please tick **one**; please use a separate form for each category you wish to enter:*

- ☐ Education and Public Awareness
- ☐ Accountability
- ☒ Dispute Resolution and Enforcement
- ☐ Innovation
- ☐ People's Choice

¹ [GPA Rules and Procedures](#), Rule 6.2 'Assembly documents':

Without prejudice to section 4.2, Assembly documents, including accreditation and observer applications may be submitted in English or in another language. In the latter case, the documents shall be accompanied by an English version. Members with the ability and the resources to do so are encouraged to translate proposed resolutions and other Assembly documents such as the Assembly Rules and Procedures.

4. DESCRIPTION OF THE INITIATIVE

a. Please provide a brief summary of the initiative (no more than 75 words)

The DPC has concluded numerous investigations into surveillance technologies used by regional/municipal authorities. These found that use of CCTV cameras to prevent littering was not underpinned by legislation that was clear, precise, or foreseeable.

As a result of the DPC's investigations, and the DPC's subsequent engagement with the relevant Government Department, the Irish Government and Parliament passed new laws providing a clear legal basis to use CCTV in a proportionate manner including safeguards for individuals.

b. Please provide a full description of the initiative (no more than 350 words)

The DPC's inquiries considered state surveillance by local authorities (regional and municipal authorities) and found widespread deployment of CCTV in public places to prevent littering. Widespread non-compliance with data protection law was discovered, resulting in the DPC exercising corrective powers, including administrative fines, bans on processing, and orders to bring processing into compliance.

The inquiries further found local authorities had an invalid legal basis under the waste management and litter pollution legislation that facilitated CCTV deployment for litter and waste purposes. While this legislation provided local authorities' powers to detect, investigate, and prosecute waste and litter pollution offences, it did not explicitly give the power to deploy or process footage for these purposes, nor did not set out the necessary procedural safeguards for use of these technologies. Consequently, the DPC banned various deployed CCTV cameras.

The DPC made the relevant Government Minister aware of these issues, and worked with the legislature and the Local Government Management Agency (LGMA) to remedy them. The legislative gap was addressed by the Circular Economy and Miscellaneous Provisions Act, 2022, which provided for lawful deployment of recording technology, including CCTV, for the enforcement of litter pollution and waste management legislation subject to statutory codes of practice. The DPC was involved in pre-legislative scrutiny of the Act and worked with the LGMA in 2024 on three codes of practice for local authorities to use CCTV and mobile recording devices to combat waste and litter pollution offences. The DPC played an active role in the scrutiny of these codes and made detailed observations on all three codes.

The DPC has seen a significant improvement in awareness and compliance due to this initiative. It is clear from engagement with local authorities increased effort is put into DPIAs and compliance documentation. The DPC is also receiving frequent queries from local authorities on implementing the codes of practice. The DPC has regular face-to-face engagement with local authority DPOs in various fora. The new legislation provides a basis for use of CCTV that is clear, precise and foreseeable to data subjects, and protects against the risk of disproportionate surveillance by authorities.

c. Please explain why you think the initiative deserves to be recognised by an award
(no more than 200 words)

This initiative deserves to be recognised because it demonstrates how the DPC's work brings about positive systemic change. It started with identifying the problem and the infringements of data protection law and the necessary exercise of corrective powers, i.e. local authorities using CCTV without a lawful basis, and then resulted with the DPC contributing to solving the problem, through pre-legislative scrutiny of new legislation and practical guidance through the creation of three codes of practice. Through its engagement, the DPC ensured that the new legislation provides a legal basis for local authorities to use CCTV and other recording technologies that protects the fundamental rights to privacy and data protection and that ensures that the use of these technologies is limited to circumstances where they are necessary, proportionate and in the public interest. The DPC's decisions and engagement with the relevant government Departments have resulted in legislative and behavioural change in a way that facilitates our policy objective. The DPC has gone from a position of awareness raising about data protection compliance in the abstract to building on practical and improved compliance.

d. Please include a photograph or image, if you wish (This will be published with your entry on the GPA website. The image can be pasted into the box below, be sent as an attachment or a link may be provided)

e. Please provide the most relevant link on the authority's website to the initiative, if applicable (The website content does not need to be in English)

[Can local authorities use CCTV to help combat anti-social behaviour and illegal dumping? | Data Protection Commissioner](#)

<https://www.dataprotection.ie/en/dpc-guidance/law/decisions/kerrycountycouncil-march-2020>

<https://www.dataprotection.ie/en/dpc-guidance/law/decisions/waterford-city-county-council-oct-2020>

<https://www.dataprotection.ie/en/dpc-guidance/law/decisions/inquiry-into-limerick-city-and-county-council-december-2021>

<https://www.dataprotection.ie/en/resources/law/decisions/kildare-county-council-january-2023>

<https://www.dataprotection.ie/en/dpc-guidance/law/decisions-made-under-data-protection-act-2018/inquiry-into-galway-county-council-august-2023>

<https://www.dataprotection.ie/en/dpc-guidance/law/decisions-made-under-data-protection-act-2018/inquiry-sligo-county-council>

[Cork City Council spent €1.2m cleaning up illegal dumping over two years](#)

[Limerick Council install CCTV at Bring Banks to combat illegal dumping - Limerick Live](#)

f. Please provide any other relevant links that help explain the initiative or its impact or success (e.g. links to news reports or articles):