Facit

UNIVERSITY OF LIMERICK
OLLSCOIL LUIMNIGH

Case study:

University of Limerick

Protecting Personal Data Using Facit's Identity Cloak

Overview

The University of Limerick, a campus of 18,000+ students with over 400 CCTV cameras and a 24/7 security operation, made a strategic decision to bring video redaction in-house by adopting Facit's Identity Cloak. Driven not by high request volumes but by forward-looking compliance planning, particularly under GDPR, Ireland's Data Protection Act 2018, and the incoming EU AI Act, the university shifted from an ad hoc, externally dependent model to a controlled, efficient internal capability that reduces risk, improves turnaround times, and keeps sensitive footage securely within the institution.

Objectives

- Build proactive redaction capability ahead of rising SARs
- Ensure compliance with GDPR
- Deliver faster turnaround, greater accuracy, and eliminate third-party security risks.
- Address all use cases including car park incidents, anti-social behaviour, and BWC footage.

Introduction:

A Subtle Shift in Campus Risk

Sitting on the banks of the River Shannon, the University of Limerick has long been synonymous with academic excellence, strong graduate job prospects, and an international outlook.

With more than 18,000 students and a staff of around 1,500, the university operates more like a small city than a typical campus.

Like many European higher education institutions, the university dealing with a growing tension between being open and being secure. This tension shows up most clearly in the expanding role of surveillance. The university's 400 plus CCTV cameras and 24/7 security operation, supported
by approximately 60 security officers, generate a huge volume of video data every day.

In the past, video footage was mostly used reactively - to look into incidents like car park collisions. Nowadays, however, the rules on how that footage is stored, processed and shared have changed significantly.

At the heart of this security evolution is a relatively under-discussed capability: video redaction.

The Challenge-

Rising Subject Access Requests

Bringing Video Redaction In-House

Until recently, the request for footage and subject access requests at the University of Limerick were handled internally by the IT department, and were potentially outsourced.

While the arrangement worked, this ad hoc compliance model created problems. Turnaround times were variable, costs were unpredictable, and the bigger concern was that there were doubts about the security of the data if and when it left the university.

The Facilities Management department made a strategic decision to take video redaction in house. This wasn't driven by volume - the university only gets a small number of requests each year - but by looking ahead. Most requests are related to minor incidents - car park damage, insurance claims, the odd dispute. Yet even these run-of-the-mill cases carry some legal weight.

As Kieran Tuite, Security and Events Manager notes, the expectation is that there will be an increase in subject access requests. Regulatory changes, people becoming more aware of their data rights, and the increasing use of surveillance technologies all point to a future in which data requests become more common and more complicated.

The Challenge-

Why Universities Now Need Video Redaction Software

Bringing Video Redaction In-House

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The reality of SARs and Video Footage

Value Retail doesn't get bombarded with SARs, but even a small increase was enough to expose the glaring inefficiencies in their old processes. Most requests relate to incidents in car parks - minor incidents or insurance claims - rather than in-store events, which individual brands typically handle themselves.

When responding to SARs involving video, one critical rule applies: only the data subject (the person making the request) can be identifiable in the footage. Everyone else must be redacted. Why? Because those other people also have privacy rights under GDPR, and revealing their identities without legal justification would be a data breach.

This redaction requirement creates a significant challenge. In a busy retail environment, a single frame might contain dozens of people.

Manual Processes and Substandard Redaction

Before adopting a specialised solution, Value Retail relied on manual redaction methods:

- Extracting still images from video footage
- Placing black boxes over faces or license plates
- Editing clips using whatever tools they had to hand

It just about worked, but this approach was far from ideal.

Manual redaction doesn't scale, period. Even a slight increase in SARs can quickly overwhelm teams, especially when video editing is just one small piece of much broader data protection responsibilities.

The Regulatory Framework: UK and Ireland

United Kingdom Context

Although the University of Limerick operates in Ireland, its practices are informed by broader UK and EU standards - particularly through collaboration networks like the Association of University Chief Security Officers (AUCSO).
In the UK, universities have got to comply with:

- UK GDPR
  The UK's post-Brexit version of GDPR that sets out how personal data gets processed.
- Data Protection Act 2018
  Supplements UK GDPR and includes specific provisions for law enforcement and intelligence services.
- ICO CCTV Code of Practice
  Provides guidance on surveillance - including transparency, proportionality, and data minimisation.
- Freedom of Information Act 2000
  While not directly related to personal data, the Freedom of Information Act overlaps with disclosure obligations - especially when it comes to publicly funded institutions.

Republic of Ireland Context

For the University of Limerick, compliance is all about making sure it has the right systems in place to meet various regulations, including:

- **General Data Protection Regulation (GDPR)**
  Directly applicable across EU member states, including Ireland.
- **Data Protection Act 2018 Ireland**
  This is the Irish law that enforces GDPR at a national level and gives the Data Protection Commission its teeth.
- **Data Protection Commission**
  The supervisory authority responsible for enforcement.
- **ePrivacy Regulations**
  Relevant when surveillance overlaps with electronic communications.

In Ireland, penalties mirror GDPR standards, with significant financial and reputational consequences for non-compliance.

The Emerging Impact of the EU AI Act

It's not all about GDPR, though. The EU AI Act is another layer of complexity that's on the horizon, whose enforcement mechanisms begin in 2026. Any surveillance systems that involve tracking or facial recognition are going to be classed as "high-risk AI systems" - and that brings its own set of rules.
These rules mean that we're going to have to be transparent about how we use AI to process data - among other things.

- Transparency about how AI is used to process data
- Risk assessments and mitigation strategies
- Documentation and audit trails
- Scrutiny of bias and fairness in AI decision-making

For universities, this means that even tools designed to simplify redaction, such as AI-assisted tracking, must be deployed carefully. While automation offers efficiency, it also brings regulatory accountability.

Failure to comply with data regulations can result in fines of up to £17.5 million or 4% of global turnover under UK GDPR.

The Solution: Facit's Identity Cloak

A Practical Shift

Against this backdrop, the University of Limerick selected Identity Cloak as its video redaction solution. The decision followed demonstrations from several vendors.

From an operational perspective, the university saw some immediate benefits:

- Speed
  Tasks that used to take hours to complete were suddenly getting done in no time.
- Accuracy
  Using automated and semi-automated tools cut down on the risk of human error.
- Control
  Keeping the footage in-house meant that the university had more control and reduced its exposure to risks from third-party providers.

The software also provided some useful, valued features, such as the ability to create custom-shaped blur effects, or to zoom in on distant activities in footage, together with the capability to adjust the level of redaction to suit the situation. For example, when sharing footage of a bus stop altercation, the university can obscure everyone except the person of interest without causing any issues with data protection.

Managing Real-World Events and Situations

The practical value of redaction software becomes clear in everyday cases:

Car Park Incidents
The most common requests received by the university involve vehicle damage. In these cases, footage must be edited so that only the requesting individual, or their vehicle, is visible. Other drivers, pedestrians and registration plates must be obscured.

Anti-Social Behaviour
Universities are increasingly proactive in addressing low-level disorder before it escalates. Redacted footage can be shared internally or with third parties without breaching privacy obligations.

Victim Access Requests
When individuals request footage of themselves, GDPR requires that their data be provided, but not the data of others. Redaction ensures regulatory compliance while respecting third-party rights.

Body-Worn Camera Footage
Although BWC SARs are currently few in number at the university, BWC usage introduces new dimensions, including the potential need for audio redaction. Identity Cloak's ability to redact both video and audio means that the university is well positioned to cope with future demand

Cultural and Organisational Impact

In addition to compliance, the university's shift to in-house redaction has had some notable effects on its organisational culture:

- **Increased Confidence**
  Security staff feel more comfortable handling requests internally now.
- **Improved Responsiveness**
  The university is confident that it can act faster and turn compliant video around quicker.
- **Knowledge Retention**
  The Facilities Management department is able to build its expertise so that it remains in-house, unlike when video redaction was sent to the IT department.

There is also a subtle but important shift in outlook: video footage is no longer just a piece of evidence; it is seen as regulated data that requires careful stewardship.

The Role of Collaboration

Membership of the Association of University Chief Security Officers provides the University of Limerick with access to a network of peers who face similar challenges. Within this forum, institutions share best practices, benchmark approaches and anticipate emerging risks.
This collaborative approach is particularly valuable in navigating new regulations such as the EU AI Act, as interpretation and implementation are still evolving.

Looking Ahead:

From Reactive to Strategic

While the current redaction needs at the University of Limerick are relatively straightforward, developments are become clearer. Several factors will shape future demand:

- Increased awareness of data rights among students and staff
- Expansion of surveillance technologies
- Greater regulatory scrutiny
- Integration of AI into security systems

In this context, video redaction has become a strategic requirement.

> "The product's ease of use and customer support were among the factors that decided us on Facit's Identity Cloak."
>
> Kieran Tuite , Security and Events Manager

Conclusion:

A model for the education sector

The University of Limerick's transition to in-house video redaction illustrates a broader shift in higher education generally. What began as a response to occasional data requests has become part of a comprehensive data governance strategy.

By investing in Facit's Identity Cloak, the university has positioned itself to:

- Meet current regulatory obligations
- Anticipate future compliance challenges
- Reduce operational risk
- Enhance efficiency and control

As universities continue to balance openness with security, the ability to manage video data responsibly will only grow in importance.

In this evolving compliance landscape, redaction is not merely a technical function, it has become a cornerstone of accountability.

About Facit

Cutting-edge compliance and video analytics software

Solve problems, create opportunities and enhance business operations

23	170+	2
Countries where Facit solutions are developed	Current customers	Technology patents granted

Commitment to quality. Simplicity. Excellence. Innovation

Commitment to quality
We offer consistently high-performing products thanks to years of in-depth team experience and innovative testing.

Simplicity
We offer simple solutions to complex problems, saving you time and resources.

Excellence
We help our clients future-proof their organisations with compliant document and video redaction solutions.

Innovation
We work with the brightest minds from around the world to deliver innovative solutions for our compliance and video analytics clients.

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