

CCTV: INFORMATION

- It is absolutely essential that appropriate signage is in place where CCTV is in operation.
- It is also important that all parishes where CCTV is in operation contact their CCTV provider to ensure that they are data protection compliant and can facilitate the following:
 - Subject access requests (i.e. have the appropriate technology to pixelate out images if one data subject requests their recordings);
 - A detailed breakdown of camera specification (see policy template);
 - Automatic or supervised deletion of recordings: recordings should not be kept for more than 30 days unless there is an ongoing investigation. CCTV providers should ensure automatic deletion of data OR be on site every 30 days to manually ensure same.
- Access to CCTV systems is clearly defined. If access to the CCTV system does not or cannot match the template attached, please agree appropriate system access with the provider. If in doubt, contact the Diocesan Data Protection Officer (*dpo@elphindiocese.ie*).

CCTV Policy: _____ Parish

Closed Circuit Television Cameras (CCTV) operated on this premises are regulated in accordance with the GDPR and the Data Protection Act, 2018. This policy was last reviewed in July 2018 and is subject to change.

Purpose of recording

CCTV recording on this premises takes place for the safety and security of employees and visitors, and in order to detect intruders.

CCTV will only be used for the purposes of monitoring employees and visitors where there is an established risk to their Health & Safety, e.g. in locations where accidents have previously happened. Notices will be put in place should such monitoring take place.

CCTV will not be used for covert surveillance unless in conjunction with an investigation and where approved by legal counsel and/or An Garda Síochána.

System Access

Our system is operated and maintained by _____.

Access to CCTV is only as necessary and by suitably authorised personnel, e.g. security manager, staff of _____ parish and the parish priest. Equipment is tested and monitored in a planned and coordinated manner.

System Specifications [PLEASE AMEND THESE DETAILS AS APPROPRIATE FOR YOUR SYSTEM]

The CCTV system is a conventional static system. It records digital images and is equipped with motion detection. It records any movement detected by the cameras in the area under surveillance, along with time, date and location. There are no pan and tilt cameras in operation on this premises. Images which are recorded are of sufficient quality to support identification of individuals captured. Cameras are in operation 24 hours a day, 7 days a week. Cameras will not overlook or record any external spaces or property. Where this cannot be avoided, the relevant owner will be consulted.

Signage

Appropriate signage is displayed in prominent locations on the premises to ensure awareness of employees and visitors.

Retention of Data

CCTV recordings are retained for no longer than 30 days, unless required as evidence in legal proceedings. Access to recordings is restricted to the Security Manager, the Parish Priest and suitable personnel from the CCTV service providers, who are bound by the same privacy standards as ourselves. We require all security staff to have signed non-disclosure / confidentiality agreements prior to gaining access to CCTV recordings.

*****Please confirm CCTV provider can delete every 30 days*****

Subject Access Requests

Data Subjects who have been recorded on CCTV must submit Subject Access Requests in writing (emails are also sufficient). Once received, the requested data will be issued within one month. CCTV service providers must be suitably qualified to pixelate images of other Data Subjects captured in recordings. *****Please ensure CCTV provider can facilitate this*****

An Garda Síochána

Access to CCTV recordings can be granted to members of An Garda Síochána when submitted via the appropriate Garda Data Protection form for the purposes of an investigation.