



# Augustinian Province of Ireland

## CCTV POLICY

January 2021

The Augustinian Province of Ireland is a registered charity (CHY7182 CRN 20014926) with its Provincial Office at St. Augustine's, Taylor's Lane, Ballyboden, Dublin 16, D16YN32. (Due to refurbishment work the Provincial Office has relocated to 16, Zion Road, Rathgar, Dublin 6, D06FA30 until Spring 2022)

This policy has been developed to demonstrate our commitment to protecting and respecting your personal data. We use a range of communication services to send information to our members, donors, volunteers and the general public for the purposes of providing up to date information on mass times, events, news, evangelization and more.

The Augustinian Province of Ireland fully complies with Irish Data Protection Legislation and the Data Protection principles set out in GDPR legislation introduced on 25<sup>th</sup> May 2018. This Policy applies to personal data collected, processed and stored electronically by the Province in relation to members, staff members, service providers, donors and those individuals, agencies and others with whom we interact in the course of our activities.

This document also outlines how we protect your personal data through the use of up to date technological systems, GDPR Awareness Training for staff and members of the order, regular Data Protection Impact Assessments and technical expert advice from third parties.

The Augustinian Order in Ireland provides a Chaplaincy service to two schools in New Ross and Dungarvan, both of which are run by Boards of Management. Whenever third parties use Augustinian premises for events in which children attend and participate, safeguarding guidelines for such events can be found on our website, [www.augustinians.ie/safeguarding](http://www.augustinians.ie/safeguarding).

# CCTV:

The Augustinian Province of Ireland as a Data Controller processes the personal data of individuals through its use of Closed Circuit Television (CCTV) at its premises throughout the province. All recorded material is the property of the Augustinians. This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material.

The Augustinian Province of Ireland use CCTV for the following purposes...

- Security – to assist in providing for the security of members of the faithful, friars, staff, volunteers and visitors; to periodically monitor and protect Augustinian buildings and facilities; to assist in the prevention and detection of crime and prosecution of offenders.
- Risk Management – to assist in providing for the safety of members of the faithful, friars, staff, volunteers and visitors; to assist in the resolution of incidents involving workplace hazards, injuries or near misses; to assist in the processing of allegations/claims against the Augustinian Province of Ireland.
- To assist the Augustinian Province of Ireland where its grievance, disciplinary or dignity at work procedures have been invoked. CCTV surveillance will not be used to monitor individuals but may be used to gather evidence where procedures are invoked.
- To enable the Augustinian Province of Ireland to respond to legitimate requests from third parties for CCTV footage of incidents e.g., for legal proceedings or insurance investigations.

Where, in the carrying out of these purposes, images are obtained of persons committing acts of an illegal nature and/or acts which breach Augustinian rules and regulations, these may be used as evidence.

The appointed Augustinian Data Processor for the maintenance and management of CCTV will carry out periodic spot checks and maintain a log of all checks and incidents.

While every effort has been made in the layout of the CCTV system to give it maximum effectiveness, it is not possible to guarantee that it will detect every incident that takes place on its premises.

## **Lawful Basis:**

The lawful basis permitting the processing of images of individuals for the above purposes is Article 6 (1)(f) of the GDPR, i.e., the processing is necessary for the legitimate interests pursued by the Augustinian Province of Ireland and its users.

To prevent unlawful access, cameras are situated at entrances such as doors and gates. Where applicable cameras are focused directly on the access points and not on public roads, paths or private property. For Security reasons cameras are situated in the Church near money collection points and in Church shops and Mass offices. These cameras also alert Augustinian personnel in the event of an accident such as a fall or if someone is taken ill. Where possible, footage will be monitored to ensure that all friars, staff, volunteers, other, adhere to relevant health and safety regulations. Footage of findings in breach of health and safety regulation will be used in disciplinary investigations. In all areas, notices are clearly displayed stating that CCTV is in operation.

The technical specifications of the cameras are... (see Garda Guidelines on CCTV – [www.garda.ie/cctv](http://www.garda.ie/cctv))

Only Augustinian authorized personnel have access to CCTV systems as well as the security service providers who installed and maintain the system (Data Processors). The Augustinian Province of Ireland has a Data Processing Agreement with the above which is reviewed on an annual basis. Retention of recordings in line with GDPR is set at 28 days and information is stored on a password protected hard-drive and on password protected cloud storage software. When used in conjunction with an investigation or as evidence, recordings may be retained by request specifically in that context until the issue is resolved. After this period, images are safely deleted. A review of cameras surveillance capabilities and locations is conducted every six months.

### **Third Party Access:**

Access to recordings may be viewed by An Garda Síochána for the purposes of preventing or investigating a crime and recordings can be taken away on receipt of a formal written request from a Garda Superintendent. Recordings are securely deleted at the conclusion of the investigation.

Disclosure of information to other third parties is made in strict accordance with the purposes of the system as outlined in this policy. Requests must be made in writing to the Provincial Office. A decision to refuse such a request may be appealed to the Provincial of the Order.

### **CCTV DO's**

- Only use CCTV systems for the purposes outlined in this policy.
- Note the legal basis for using CCTV Systems: *The legitimate interests of the Augustinian Province of Ireland to protect themselves and their property, GDPR Article 6 (1)(f) of the GDPR, the Safety, Health and Welfare at Work Act 2005 and Section 3 of the Occupier's Liability Act, 1995.*
- Erect at least two clearly visible CCTV warning signs at every entrance.
- Make the warning signs readable to people before they enter camera shot.
- Ensure that CCTV warning signs state that CCTV is in operation, the purposes for which it is used and the Provincial Office contact details (info@augustinians.ie) in case there is a query or Data Subject Access Request.
- Use coloured warning signs with yellow in the background. (see appendix)
- Hold hardcopies of this policy in reception areas to give to Data Subjects on request.
- Allow Gardaí investigating a crime to review CCTV footage on-site to see if it is of use.
- Get a formal written request, signed by a superintendent, if Gardaí wish to take a copy of CCTV footage off the premises.
- Keep a log of these Garda requests and a copy of each formal request.
- Always balance the risk of security or personal safety against the risk of intrusion into the privacy of individuals.
- Locate cameras so as to avoid monitoring of passers-by or private property.
- Fulfil Data Subject Access Requests within 30 days. No fee is payable.
- Retain CCTV images for a maximum of 28 days, 65 days for personal injury claims or for the duration of any legal claims made against the Augustinian Province of Ireland.
- Restrict CCTV access to authorized personnel only.
- Log all access to CCTV, including by Gardaí.
- Keep CCTV storage devices and media in a secure location.
- Backup CCTV systems, where possible.
- Be able to prove that processing of CCTV images complies with the GDPR
- Establish and maintain a record of all CCTV related processing activities.
- Report breaches of identifiable CCTV images to Augustinian Provincial Office.

- Allow Data Subjects to fully exercise all their rights under the GDPR within 30 days and free of charge.
- Build Data Protection principles into new CCTV installations at the design stage.
- Have binding legal contracts with all Processors conforming with Article 28 GDPR.

#### **CCTV DO NOTS**

- Locate CCTV warning signs on cameras, camera poles, beside cameras or anywhere that a person enters camera shot **BEFORE** they can read the sign.
- Use monochrome signs, or signs with a grey background, as they are unfair.
- Allow Gardaí to remove CCTV footage without a formal written request from a Superintendent.
- Continuously monitor friars, visitors, volunteers or staff at their work.
- Monitor areas where individuals have a reasonable expectation of privacy such as toilet areas, showers, changing rooms, locker rooms or rest rooms.
- Record passers-by on the street or monitor the private property of others.
- Use CCTV systems to record audio.
- Use Augustinian CCTV systems for covert surveillance under any circumstances.
- Show or give anyone CCTV footage with identifiable images of other Data Subjects or that allows them to be indirectly identified (e.g., from vehicles)
- Allow processors to process CCTV images except on documented instructions.
- Allow processors to engage a sub-processor without prior authorization.

**CCTV Subject Access Request Form**

**Details of Requester:**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Email Address: \_\_\_\_\_ Tel Number: \_\_\_\_\_

**Details of Request:**

Under Article 15 of the GDPR, I request CCTV access as follows:

View CCTV footage  Copy of CCTV footage

Reason for Request: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date of Recording: \_\_\_\_\_ Time of Recording: \_\_\_\_\_

Start Download (time) \_\_\_\_\_ End Download (time) \_\_\_\_\_

Location of Recording: \_\_\_\_\_

\_\_\_\_\_

*I acknowledge that , before I am given access to personal information about myself, I may be asked for ID.*

*I acknowledge that I will not normally be given access to the personal information of another person unless I have obtained the written consent of that person.*

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Completed forms to be sent to...*Augustinian Provincial Office, 16 Zion Road, Rathgar, Dublin 6, D06FA30*

| <i>Office Use Only Sensori Security Systems</i> |             |                   |               |
|---|-------------|-------------------|---------------|
|   | <b>Date</b> | <b>Time</b>       | <b>Who By</b> |
| <b>System Download Requested</b>                |             |                   |               |
| <b>Evidence/Authenticate:</b>                   |             |                   |               |
| <b>Result:</b>                                  |             |                   |               |
| <b>Copied to Memory Stick:</b>                  |             |                   |               |
| <b>Download Failed Report:</b>                  |             |                   |               |
|   |             |                   |               |
| <b>No of Copies Made</b>                        |             |                   |               |
| <b>Copy 1 Given to</b>                          |             | <b>Date Given</b> |               |
| <b>Copy 2 Given to</b>                          |             | <b>Date Given</b> |               |
| <b>Copy 1 Received Back</b>                     |             | <b>Date</b>       |               |
| <b>Copy 2 Received Back</b>                     |             | <b>Date</b>       |               |
| <b>No of Still Photos</b>                       |             |                   |               |
| <b>Copies Given To:</b>                         |             | <b>Date</b>       |               |
| <p>Signed: _____ Date: _____</p>                |             |                   |               |

**CCTV Requests – Third Party Access Request Form**

**Details of Third Party**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Garda Badge No: (where appropriate) \_\_\_\_\_

Email Address: \_\_\_\_\_ Tel Number: \_\_\_\_\_

**Details of Request:**

I request CCTV access as follows:

View CCTV footage  Copy of CCTV footage

Reason for Request: \_\_\_\_\_

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Date of Recording: \_\_\_\_\_ Time of Recording: \_\_\_\_\_

Start Download (time) \_\_\_\_\_ End Download (time) \_\_\_\_\_

Location of Recording: \_\_\_\_\_

\_\_\_\_\_  
 \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Completed forms to be sent to...Augustinian Provincial Office, 16 Zion Road, Rathgar, Dublin 6, D06FA30

| <i>Office Use Only Sensori Security Systems</i> |      |            |        |
|---|------|------------|--------|
|   | Date | Time       | Who By |
| System Download Requested                       |      |            |        |
| Evidence/Authenticate:                          |      |            |        |
| Result:   |      |            |        |
| Copied to Memory Stick:                         |      |            |        |
| Download Failed Report:                         |      |            |        |
|   |      |            |        |
| No of Copies Made                               |      |            |        |
| Copy 1 Given to                                 |      | Date Given |        |
| Copy 2 Given to                                 |      | Date Given |        |
| Copy 1 Received Back                            |      | Date       |        |
| Copy 2 Received Back                            |      | Date       |        |
| No of Still Photos                              |      |            |        |
| Copies Given To:                                |      | Date       |        |
| Signed: _____ Date: _____                       |      |            |        |



# **CCTV**

**Warning this site  
is under 24 hour  
surveillance**

**Please contact [info@augustinians.ie](mailto:info@augustinians.ie)  
To Report Any Concerns**