



# ST. PATRICK'S CENTRE, KELLS ROAD, KILKENNY

## Policy Document

**POLICY TITLE:**

**CCTV Policy**

Prepared by:

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Approval Date:


13.05.2021

Review Date:

13.05.2023

Policy Number  
21 – Schedule 5

Approval By

Signed:   
CEO (Interim)

Signed:   
Board Member

### ***Mission Statement***

Utilising our resources and skills to provide intentional supports for the people we support; enabling them to live full and inclusive lives by contributing to and enriching the fabric of their local communities.

SPC partners with external agencies and community services to facilitate '*ordinary lives in ordinary places*'

### ***Vision Statement***

People supported will live a good life, in their own home, with supports and opportunities to become active, valued and inclusive members of their local communities.

Review Date:	Amendments Required	New Revision Status
Revision No:		
Reviewed By:	Approved By:	
	Signed: _____ CEO	

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## **1.0 Policy Statement:**

- 1.1. Closed Circuit Television (CCTV) on SPC premises are regulated in accordance with the Data Protection Acts 1988 to 2018 and GDPR 2018.

## **2.0 Policy Purpose:**

- 2.1. The purpose of this policy is to outline the safeguards in place with regard to the operation of and access to the CCTV systems, and the resultant images.

## **3.0 Policy Scope**

- 3.1. This policy applies to all staff involved in the operation of SPCs CCTV systems, which includes only one system at this time located in SPC premises, Blossom Hill.
- 3.2. People supported in Blossom Hill are informed via an easy read version of this policy of the purpose, location and existence of the CCTV system in place.

## **4.0 Legislation:**

- 4.1. Data Protection Acts 1988 - 2018 & GDPR Regulations 2018

## **5.0 Purposes of CCTV:**

- 5.1. The CCTV system is operated on one SPC premises for the safety and security of the people we support, our staff, buildings, information located or stored on the premises and assets.
- 5.2. The CCTV system may be used to investigate security incidents in order to secure evidence, should such incidents occur.

## **6.0 Purpose Limitation:**

- 6.1. The CCTV system is not used for any other purpose than that outlined in 5.0

## **7.0 Roles & Responsibilities:**

- 7.1. The CCTV system of SPC premises is operated and maintained by AP Systems.
- 7.2. The system is accessed as necessary by staff of AP Systems and the Health & Safety personnel of SPC. All equipment is tested and monitored in a planned and coordinated manner.
- 7.3. The Head of Health & Safety in SPC has overall responsibility for overseeing the contractual CCTV services provided by AP Systems.
- 7.4. The PIC will ensure that in case of new admissions to Blossom Hill, people supported and their families will be informed of the CCTV.

## **8.0 Summary Description & Technical Specifications for the CCTV System:**

- 8.1. 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, together with time, date and location.
- 8.2. All cameras operate 24 hours a day and 7 times a week. The CCTV records for 28 days and then it is overridden, so the last 28 days are on the hard drive only.
- 8.3. The image quality in most cases allows identification of those in the camera's area of coverage.
- 8.4. The cameras are all fixed and fitted (as per Appendix 1).
- 8.5. The Alarm is monitored by the monitoring station (Sentry Security) by both intruder and CCTV. Should the intruder alarm activate the monitoring station will look at the site on the CCTV and if Intruders on site, Intruders will be advised by the Monitoring Company to vacate the site via external speaker on the perimeter of the House. Should an intruder fail to leave the site, the monitoring Company will ring the Gardai and attend on site immediately

## **9.0 Location of Cameras:**

- 9.1. Cameras are located at strategic points throughout the perimeter of the house, principally at the entrance and rear garden of the house.
- 9.2. AP Systems on behalf of SPC has positioned the cameras so that they only cover the exterior of the building, and they have been sited so that they provide clear images

## **10.0 Signage:**

10.1. Appropriate signs are prominently displayed so that the People we support, employees, visitors, contractors, other visitors and the public and others are aware that they are entering an area covered by CCTV.

## **11.0 Quality of the Images from CCTV:**

11.1. It is important that the images produced by the equipment are as clear as possible in order that they are effective for the purpose/s for which they are intended.

11.2. The equipment and recording media should be maintained on a regular basis to ensure the quality of the images is upheld.

## **12.0 Retaining Information & Processing Images:**

12.1. It is important that images are not retained for longer than is considered necessary for the purpose/s for which they were processed. Therefore, unless the images are required for evidential purposes in legal proceedings, they will not be retained beyond a maximum of 28 days.

12.2. In order to protect the security of the CCTV system, a number of technical and organisational measures have been put in place, including:

- Access rights to users are granted only to those where it is strictly necessary for them to carry out their work;
- Only Head of Health & Safety (after consulting with SPC's Data Protection Officer) can grant, alter or annul any access rights of any persons.

## **13.0 Access to the Images:**

13.1. It is important that access to, and disclosure of images to third parties are strictly controlled and documented. This is to ensure that the rights of the individual are maintained, and that the chain of evidence remains intact should the images be required for evidential purposes. Access to these images will normally be through the following: Court Order for Discovery, Freedom of Information access request, or a Data Protection access request.

13.2. Only in exceptional circumstances may images be disclosed to those carrying out a formal internal investigation or disciplinary procedure, where it can reasonably be expected that the disclosure of the images may help the investigation or prosecution of a sufficiently serious disciplinary offence or a criminal offence.

13.3. Third-party processors/accessors: Any third part that has access to, or

processes CCTV data on behalf of SPC will also be subject to this policy.

#### **14.0 Subject Access Requests:**

- 14.1. Under Data Protection legislation, an individual has the right to view any personal information held about them by a Data Controller, SPC. All requests should be made in writing to the Data Protection Officer.
- 14.2. The following information should be logged where access is provided:
  - Record the reason for disclosure;
  - Record the details of the image disclosed i.e. the date, time and location of the image;
  - Record who was present when the images were disclosed;
  - Record whether any images were disguised/blurred to prevent identification of individuals other than the data subject.
- 14.3. If it is not possible to disguise the images, an external company may be contracted to facilitate this. This will need to be recorded.
- 14.4. Requests will not be complied with where there are insufficient details supplied relating to the date and time of the recording. Correspondence is to be sent to the requester advising them of this.
- 14.5. If the data subject wishes to view the images on site, as opposed to a copy being sent, the viewing should take place in a closed office with only the relevant individuals present.

#### **15.0 Access Requests from An Garda Síochána:**

- 15.1. In line with the Data Protection Act 2018, An Garda Síochána are entitled to view personal information about individuals, if it is for the following purposes:
  - For the prevention or detection of crime;
  - For the apprehension or prosecution of offenders;
  - When it is required urgently to prevent injury or other damage to the health of a person, or serious loss of or damage to property;
  - When it is required by, or under any enactment, or by a rule of law or order of a Court.
- 15.2. Requests must be made on the official Garda Data Protection Form.

**16.0 Staff Training:**

16.1. All relevant employees will be trained in general awareness of the CCTV system as part of initial house induction and on the impact of GDPR with regard to that system and how it is operated.

**17.0 Change to Policy:**

17.1. We reserve the right to change this policy at any time. Where appropriate, we will notify changes via Line Management System, Unions and other relevant bodies.