



**Christ
Church
Cathedral**
Dublin

The Cathedral of the Holy Trinity
Founded c.1030
Christ Church Cathedral
Christchurch Place,
D08 TF98, Ireland

Tel +353 (01) 677 8099
welcome@christchurch.ie
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Christ Church Cathedral

CCTV Data Protection Policy

Introduction

The purpose of this policy is to set out the reasons we have implemented CCTV and how we manage it. This includes our obligations when dealing with personal data, to ensure that we comply with the requirements of the GDPR and the relevant Irish legislation, namely the Data Protection Acts of 1988-2018.

We will ensure that CCTV systems, where installed, are operated only in a way that is compatible with the provisions of this policy.

Scope

This policy relates to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. This policy applies to all CCTV images and recordings in relation to Christ Church Cathedral's data subjects. Recognisable images captured by CCTV systems are 'personal data' and are therefore subject to the provisions of the GDPR and the Data Protection Acts 1988-2018.

Data Controller

Christ Church Cathedral, whose registered address is Christchurch Place, Dublin, D08 TF98, Ireland, is the organisation that controls and is responsible for the personal data collected.

Data Processor

We rely on the expertise of a third party (Pioneer, Smart Monitoring and Manguard) to both manage and maintain our CCTV system. We ensure that they comply with the guidelines set out in this policy and the terms defined in a Data Processor Agreement. As a data processor Pioneer, Smart Monitoring and Manguard is legally obliged to have appropriate security measures in place to prevent unauthorised access to or unauthorised alteration, disclosure or destruction of the data. This includes having appropriate access controls and security procedures in place and to ensure employees are aware of their obligations relating to the security of data.

Personal Data We Collect

Our CCTV captures footage of:



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- Customers/Clients
- Visitors
- Employees
- Suppliers
- Business Contacts
- Third party processors
- Volunteers
- Board members

Purpose

We use CCTV systems and associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the safety and security and specifically for the following purposes:

- **Workplace Safety:** As responsible employers we have a duty of care to our employees under the provisions of the Safety, Health and Welfare at Work Acts and associated legislation.
- **Securing Premises:** We have a responsibility to protect the organisations property and equipment as well as providing a safe environment for data subjects while they are on our premises.
- **Crime Prevention:** Our objective is to deter crime and vandalism.
- **Incident Investigations:** We will not use CCTV facilities to actively monitor employee conduct in the performance of day-to-day duties and will not proactively use CCTV to identify conduct that may give rise to disciplinary action. However, staff are advised that in the event of disciplinary or other investigative action being conducted, CCTV footage may be sought and used where it can assist in the process. This means that the Hoey's DIY and/or individual staff members may request access to CCTV footage if it is believed it may be relevant and/or assist with any investigation or disciplinary process.

Legal Basis

- In line with Article 6(1)f processing is necessary for the purposes of the **legitimate interests pursued by the controller**. That is to protect our organisation and its assets and to maintain the safety of persons who attend our site.

General Principles

- **Necessity:** The GDPR states that processing of personal data should be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. We have undertaken the appropriate investigations to ensure that CCTV is necessary to achieve our goals.



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- **Proportionality:** Our use of CCTV is justified for the purposes set out in this policy. CCTV will be conducted in a professional, ethical and legal manner and any use of CCTV technologies for other purposes is prohibited by this policy. CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by Christ Church Cathedral to be compliant with all related legislation. CCTV monitoring of public areas for security purposes is limited to uses that do not violate the individual's reasonable expectation to privacy.
- **Security:** CCTV recordings are kept safe and secure. See details around control of access below.
- **Retention:** Footage captured by CCTV will be retained for a maximum of 60 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.
- **Transparency:** Adequate signage is displayed to indicate that CCTV is in operation. Signage is displayed at the entrance to the premises and at various points throughout the building. The signage includes a QR code linked to the CCTV Policy and Procedure with name and contact details of the data controller, the purpose of CCTV and a camera symbol. Interested parties can also contact us directly to obtain a copy of our CCTV Data Protection Policy.

Security Arrangements

Access to the CCTV system and stored images are restricted to authorised personnel only. Recorded footage is saved on hard drive and the monitoring equipment is securely stored in a locked office. Unauthorised access to that area is not permitted at any time. The area is locked when not occupied by authorised personnel. A log of access to recordings is maintained.

Covert Surveillance

Covert surveillance will only be used in exceptional circumstances and with the prior engagement of An Garda Síochána for potential criminal investigation or civil legal proceedings arising as a consequence of an alleged committal of a criminal offence.

Disclosure To Third Parties

Access is strictly limited to authorised personnel only and selected third parties only:

- **Service/Maintenance:** From time to time, we may require the expertise of third-party CCTV professionals to service and maintain the system. Such service providers are bound to comply with our data protection standards through a Data Protection Agreement.
- **CCTV Professionals:** We may require additional expertise if a subject access request warrants the blurring of third-party images. Such service providers are bound to comply with our data protection standards through a Data Processor Agreement.



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- **An Garda Síochána** may request access to CCTV footage to investigate a criminal matter. The Data Protection Commission recommends that requests for copies of CCTV footage should only be acceded to where a formal written (or fax) request is provided to the data controller stating that An Garda Síochána is investigating a criminal matter. For practical purposes, and to expedite a request speedily in urgent situations, a verbal request may be sufficient to allow for the release of the footage sought. However, any such verbal request must be followed up with a formal written request. It is recommended that a log of all An Garda Síochána requests is maintained by data controllers and processors. There is a distinction between a request by An Garda Síochána to view CCTV footage and to download copies of CCTV footage. In general, An Garda Síochána making a request to simply view footage on the premises of a data controller or processor would not raise any specific concerns from a data protection perspective.
- Legal Advisors: We may need to share footage and images with legal advisors in the event of a legal dispute.

Responsibility

Authorising the use of and supervising access and maintenance of the CCTV System is the responsibility of the CEO. The CEO may delegate the day-to-day administration of the CCTV System to another colleague.

The Data Protection Co-Ordinator is charged with overseeing the release of CCTV data on foot of subject access requests or Garda requests.

Data Subject Rights

A data subject has various rights under data protection law, subject to certain exemptions, in connection with the processing of personal data. The following rights apply to CCTV:

- Right to access the data – the right to request a copy of the personal data that, together with other information about the processing of that personal data (Subject Access Request). Requests will be processed free of charge and within one month of receipt (unless in exceptional circumstances).
- Right to erasure – the right to request the deletion of personal data.
- Right to restriction of processing or to object to processing – the right to request that personal data be no longer processed for particular purposes, or to object to processing of personal data for particular purposes.



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In order to exercise any of the above rights, please contact, Christ Church Cathedral's Data Protection Co-Ordinator (see contact details in Appendix 1). Please note, in line with our obligations to protect personal data, some requests may require validation (proof of ID etc).

Questions and Complaints

Queries and complaints in connection to our use of CCTV can be forwarded to our Data Protection Co-Ordinator (See details in Appendix 1).

A data subject has the right to complain to the Data Protection Commission if they unhappy with the processing of their personal data. Details of how to lodge a complaint can be found on the Data Protection Commission’s website (www.dataprotection.ie) or telephone contact can be made to the Data Protection Commission on 1890 252 231.

Appendix 1: Data Liaison Person Contact Details

Contact	Data Protection Co-Ordinator
Email	Hr@christchurch.ie
Tel	01 677 8099

Appendix 2 Definitions

For the avoidance of doubt, and for consistency in terminology, the following definitions will apply within this Policy.

Data	This includes both automated and manual data. Automated data means data held on computer or stored with the intention that it is processed on computer. Manual data means data that is processed as part of a relevant filing system, or which is stored with the intention that it forms part of a relevant filing system.
Personal Data	Information which relates to a living individual, who can be identified either directly from that data, or indirectly in conjunction with other data which is likely to come into the legitimate possession of the Data Controller.



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Data Controller	A person or entity who, either alone or with others, controls the content and use of Personal Data by determining the purposes and means by which that Personal Data is processed.
Data Subject	A living individual who is the subject of the Personal Data, i.e. to whom the data relates either directly or indirectly.
Data Processor	A person or entity who processes Personal Data on behalf of a Data Controller on the basis of a formal, written contract, but who is not an employee of the Data Controller, processing such Data in the course of his/her employment.
Employee	A living individual with whom COMPANY NAME has an employment relationship, regardless of whether this relationship is based on an employment contract. This includes all current and former employees who are or have been paid through the company payroll whether permanent, temporary, full time or fixed term, as well as agency workers and contractors who have data processed.
Relevant Filing System	Any set of information in relation to living individuals which is not processed by means of equipment operating automatically (computers), and that is structured, either by reference to individuals, or by reference to criteria relating to individuals, in such a manner that specific information relating to an individual is readily retrievable.
CCTV	Closed-circuit television is the use of video cameras to transmit a signal to a specific place on a limited set of monitors. The images may then be recorded on USB or other digital recording mechanism.
Data Protection Co-Ordinator	A person appointed by Christ Church Cathedral to monitor compliance with the appropriate Data Protection legislation, to deal with Subject Access Requests, and to respond to Data Protection queries from colleagues and customers.
Data Protection Officer (DPO)	DPOs are registered with the Data Protection Commission. Their primary role is to ensure the organisation processes personal data in compliance with the applicable data protection rules. The DPO is a senior position which carries legal responsibilities.



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