



**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
christchurchcathedral.ie

Christ Church Cathedral

CCTV Data Protection Procedure

Introduction

The purpose of this procedure is to set out the steps required to manage and control use of and access to Christ Church Cathedral's ('we', 'the organisation') CCTV images and recordings at its premises located at Christchurch Place, Dublin, D08 TF98, Ireland. The system is operated and managed externally by Pioneer, Smart Monitoring and Manguard.

Scope

The procedure is limited to the actions of Christ Church Cathedral staff on site and therefore cannot detail the technical procedures undertaken by Pioneer, Smart Monitoring and Manguard as Data Processors.

Internal Management and Control of CCTV Images and/or Recordings

- Images captured by cameras will be recorded on equipment located securely within main office.
- Access to cameras is available from this building. Cameras cannot be accessed via mobile phones.
- There is monitoring equipment which allows security personnel to monitor live images from the cameras.
- Footage can only be replayed if it falls in line with this procedure and is always recorded in the CCTV access log.
- All CCTV access requests are documented in the CCTV Request Log by the Data Protection Co-Ordinator or a Cathedral manager. This log will include Request Forms, USB references and a record of viewings.
- If the Data Protection Co-Ordinator considers that the assistance of a member of staff is needed to identify a victim, witness or perpetrator in relation to a criminal incident, wherever practicable, the member of staff should be invited to view the images in a private environment.

Subject Access Requests

As with all personal data, individuals have the right to access footage of themselves in CCTV recordings.

Requests can be made in writing using the CCTV access request form, Appendix 1. Although this written request is not compulsory, and a verbal request is equally valid. Identification may be required.

Christ Church Cathedral should reply promptly and in full to the request no later than 30 days from the date of receipt of a valid request.



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Downloading the footage is the responsibility of the Data Protection Co-Ordinator. Recorded material is handled with care and in a confidential manner to ensure complete regard for individual privacy. Footage is downloaded on to a USB; a copy given to the requestor and a copy held securely on file.

CCTV images or footage that includes others should have their images pixilated so they are not recognisable. The footage retained should be kept only for the purpose and time period it was required and it should be safely destroyed after that time.

Employees can forward their CCTV subject access request to hr@christchurch.ie. For more information about subject access requests refer to the Subject Access Request Policy and Procedure.

Third-Party Access – The Gardaí

The General Data Protection Regulation (GDPR) restricts how personal data may be processed by a data controller. In particular, personal data may not be used for a purpose incompatible with the purpose for which the data was initially collected.

One exception to this is Section 41(b) of the Data Protection Act 2018. This allows a data controller operating in Ireland to disclose personal data to a third party to the extent that this is “necessary and proportionate for the purposes of preventing, detecting, investigating or prosecuting criminal offences”. Typically, this arises following a request from An Garda Síochána or another law enforcement body for disclosure of information containing personal data. This might be for various information relating to named individuals or for a copy of CCTV footage. The request might be marked urgent, refer to serious criminal allegations, or be broad or exploratory in nature.

Unless there is a legal obligation or a mandatory reporting requirement, there is no obligation to comply with a request if it is made under Section 41(b) of the Data Protection Act 2018. However, if you choose to comply with such a request in full or in part, you bear the risk as the data controller. This means being satisfied that disclosing the personal data is necessary and proportionate for the purpose of preventing, detecting, investigating or prosecuting criminal offences. This includes keeping appropriate records to justify the decision and to demonstrate accountability under GDPR.

The organisation will also have other obligations, including transparency to data subjects, data minimisation, facilitating data subject rights, and ensuring appropriate data security.

If information concerning individuals or video footage is important for a criminal investigation, the Gardaí can (and often will) get a District Court order or even a search warrant. If this is served, there will be a legal obligation for Christ Church Cathedral to provide the information. Depending on the circumstances, this may be preferable to complying voluntarily with a request made under Section 41(b) and taking on the risk and potential liability of getting it wrong.



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If we choose not to comply with a disclosure request that is made under Section 41(b), which we are entitled to do in the absence of any other legal or statutory obligation, it must be borne in mind that the communication received may likely contain sensitive or confidential information which should not be retained unless there is a specific reason to do so. Requests from the Gardai can be recorded and submitted using the CCTV access request form in appendix 1.

Other Third-Party Access Requests

Disclosure of information to third parties is strictly limited and made only in accordance with the purpose of the system. Such third parties may include:

- CCTV administrators, facilities staff, security personnel
- Members of Christ Church Cathedral staff involved with a grievance, disciplinary at work procedure
- Legal or insurance representatives
- CCTV companies for service/repair or assistance regarding pixelating images

Installation and Maintenance

The system is maintained under contract by Pioneer, Smart Monitoring and Manguard. This contract sets out the legal obligations to protect data which may be viewed while they are carrying out their services.

Requests for installation of additional cameras must be submitted to Pioneer, Smart Monitoring and Manguard for consideration. A DPIA (Data Protection Impact Assessment) must be conducted in consultation with the Data Protection Co-ordinator to ensure that data subjects rights are infringed only in a proportionate way and that other methods of security or surveillance have been considered.

Retention

The retention periods in relation to CCTV Requests, in line with our Data Protection Policy, are as follows:

- CCTV Request Forms: 1 year. This form should be stored in a secure location as they may need to be accessed at a later date. It should be stored for 1 year, after which it can be shredded.
- CCTV Access Log (log of access requests & log of viewings): 1 year (entries can be deleted after 1 year). It is the responsibility of the Data Protection Co-ordinator with responsibility for the CCTV system to authorise and delete entries in line with this retention period.
- If viewings/recordings are part of a legal case: case concluded plus 5 years. It is the responsibility of the Data Protection Co-ordinator with responsibility for the CCTV system to authorise and delete entries in line with this retention period.



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Adherence to this Procedure

All employees with responsibility for the installation, operation or access to the CCTV system are expected to comply with this procedure. Any failure to comply may be a disciplinary offence.

Supporting Documents

This procedure should be read in conjunction with the **CCTV Data Protection Policy**.

Document Reviews

This procedure will be reviewed and updated annually or more frequently, if necessary, to ensure that any changes are properly reflected.

Document History

Date	Current Version	Details of update	New Version	Completed by:
Feb 2024	-	New	V1	Data Protection Co-Ordinator

APPENDIX 1: CCTV ACCESS REQUEST FORM

<i>Requestors may be asked for identification prior to the release of CCTV footage. Personal data of other persons will not be provided without the written consent of that person.</i>
Personal Details
Full Name:
I am a (please select): <i>(Employee/Contractor/Visitor/Member of the Public/Gardaí/Other):</i>
Email Address:
Phone Number:



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Customer Reference / Employee Payroll Number (if applicable):

Details of the Request

I would like access to

View CCTV footage

A copy of CCTV footage

Reason for Request: _____

Date of Recording: __/__/__

Time of Recording: _____

Start Download: _____

End Download: _____

Location of Recording:

Signed: _____

Date:

For Internal Use Only:

Request authentication (ID/Completed form)

Request approved By _____

Request received by: _____ Date: __/__/__ Time: _____

System Download Requested Date: __/__/__ Time: _____ By: _____

Copied to USB (Or other, please state): _____

Number of copies made: _____

Redaction/Pixilation required: Yes/No. If Yes, by whom was this completed: _____ Date:

__/__/__

Copy 1 provided to requestor Date: __/__/__ Time: _____

Copy 2 stored Location: _____



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Copy 1 returned (if applicable) Date: __/__/____ Time: _____

Copy 2 destroyed Date: __/__/____

Signed: _____ Date: _____