

Diocese of Elphin – HR Policy Handbook

Document Name: CCTV Policy
Document No: 3.1.4 (original)
Effective Date: 15th February 2019
Written By: Frank Mitchell, HR Advisor
Approved By: +Kevin Doran, Bishop of Elphin



Operating under the patronage of Our Lady of the Immaculate Conception, the Diocese of Elphin aims to provide staff members with a safe, caring and supportive Christian environment in which to carry out their work. Work objectives are to be advanced with due regard to the needs and dignity of each staff member and with due regard for the individuals and communities the diocese serves.

This document outlines the Diocesan policy on CCTV. It is applicable to parishes, offices, agencies and any entity operating under the governance of the Diocese of Elphin (hereafter referred to as "the employer"). Line Managers (Bishop, Priests, Deacons, Religious, Lay Personnel who supervise staff members) are responsible for communicating this policy and having it signed off by their staff member(s).

CCTV is used by "the employer" as part of the operational system for security. The purpose of the system is to protect against crime, including theft or pilferage, and to ensure the security of all staff and property. "The employer" reserves the right to use information obtained by CCTV for disciplinary purposes. Webcams are used by some parishes to broadcast Mass and Religious services. Web Cameras are regarded as CCTV under the Data Protection Acts.

"The employer" is required to ensure the use of Web Cameras and CCTV is in line with requirements under the Data Protection Acts 1988 and 2003 and GDPR 2018. All staff members have a responsibility to adhere to this policy and failure to do so may result in disciplinary action, up to and including dismissal.

Overall responsibility for "the employer's" CCTV system lies with the Parish Priest/Administrator/Manager where CCTV (including Webcams) are located. Access to the CCTV system and recorded material is strictly restricted to authorised personnel.

Cameras

(To be completed by each parish organisation having CCTV, including Webcams)

"The employer" operates ____ number of cameras which are located in _____ (specify areas). These operate on a 24-hour basis, seven days a week.

Processing the images

(To be completed by each parish organisation having CCTV, including Webcam)

Recorded images are retained for ____ weeks/months from the date of recording. However "the employer" reserves the right to retain images for a longer period where there are objective reasons for doing so. Those staff members with responsibility for processing CCTV images must only do so in line with established procedures and must ensure the security of the data at all times. Any staff member who uses the CCTV system or CCTV images in an unauthorised manner may be subject to disciplinary action up to and including dismissal. Unauthorised use is any processing incompatible with the data's original purpose including, but not limited to:

- disclosure of images containing personal data to an unauthorised third party, including other staff members;
- unauthorised processing of personal data in the form of copying the images on to any portable device or website or in print format;
- circulation of images containing personal data by email or posting of images containing personal data on the internet.

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Access to and disclosure of images to third parties

Access to and disclosure of images recorded by the CCTV system is carefully monitored. Access to images by third parties will only be allowed in limited and prescribed circumstances permitted by legislation. Such circumstances may include the disclosure of personal information in order to:

- safeguard the security of the State;
- prevent, and investigate offences, or collect any tax or monies owed to the State;
- protect the international relations of the State;
- prevent injury or damage to property;
- meet legal requirements;
- obtain legal advice, or for the purpose of legal proceedings;
- meet a request from, or with the consent of, the data subject, or a person acting on his or her behalf.

"The employer" also reserves the right to disclose personal information to specific third parties where there are objective reasons for doing so. Such third parties may include:

- insurance providers;
- medical practitioners;
- pension and medical insurance providers.

Access by data subjects

Under the Data Protection Acts individuals have the right to access images containing their personal data. This applies equally to staff and members of the public. All requests must be made in writing and should be forwarded to the Parish Priest / Administrator / Manager in charge. Careful consideration must be given to requests for access that would involve disclosing images of third parties. This may be overcome by blurring or disguising the images of third parties.

Individuals requesting access to images must supply "the employer" with the following:

- adequate information for the images to be located;
- sufficient information to enable "the employer" to verify that the applicant has a legitimate right to request access;
- proof of identification through photographic identification, for example passport or driving license;
- an administration fee of €6.35.

Individuals should specify whether they would be satisfied with merely viewing the images rather than requiring a copy. A copy of the personal data of the individual will be supplied within one month of the request. In the event that a request for access is denied, "the employer" will document the following:

- the identity of the individual making the request;
- the date of the request;
- the reason for refusing to supply the images requested.

The document will then be signed and dated and will be provided to the individual making the data access request.

For further information please contact:

HR Advisor, Elphin Diocesan Office, St. Mary's, Temple Street, Sligo F91 KTX2
 Email: hr@elphindiocese.ie
 Mobile: 087 240 4882