

St Michael's Rowing Club (SMRC)

CCTV Policy & Procedures

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1.0 Introduction

SMRC, as a data controller, processes the personal data of individuals through its use of Closed Circuit Television (CCTV) at its boathouse on O'Callaghan Strand

Recognisable images captured by CCTV systems are personal data and are therefore subject to the provisions of the General Data Protection Regulation (GDPR) and the Data Protection Acts 1988-2018 [hereafter referred to as "data protection legislation"].

2.0 Purpose of Policy

The purpose of this policy is to regulate the use of CCTV in the monitoring of both the internal and external environs of the club. The aim is to ensure that CCTV is used transparently and proportionately in accordance with data protection legislation, the club's Data Protection Policy and guidance provided by the Data Protection Commission.

3.0 Scope

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material.

It applies to members, staff and visitors to SMRC.

4.0 Ownership of the CCTV System

SMRC is the data controller and all recorded material is the property of SMRC.

1. Purposes of CCTV

CCTV surveillance is employed for the following purposes:

- Security: To assist in providing for the security of members, staff and visitors; to periodically monitor and protect SMRC 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, staff 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 SMRC.
- To assist SMRC where its grievance, disciplinary or dignity at work procedures have been invoked. CCTV surveillance will not be used to monitor individuals to gather evidence to invoke a procedure.
- To enable SMRC 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 SMRC's rules and regulations, these may be used as evidence.

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 club grounds

6.0 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 SMRC and its users.

7.0 Signage

Signage is displayed at the entrance to the club so that members, staff and visitors are aware that CCTV cameras are in use:



8.0 Installation and Maintenance of the CCTV System

CCTV systems are installed and maintained by a PSA licensed CCTV company contracted by SMRC. The CCTV company operates under the instruction of SMRC and provides SMRC with assistance in pixelating images of 3rd parties when an approved access request is received. In so doing, the CCTV company is considered to be a data processor.

Data protection legislation places a number of obligations on data processors, including having appropriate security measures in place to prevent unauthorised access to data or unauthorised alteration, disclosure or destruction of data.

1. Management, Storage & Retention of CCTV Footage

The system is managed by the following CCTV administrator:

- Kieran Kerr (kieran.kerr@gmail.com)

Recordings are stored on a computer hard-drive accessed only by authorised personnel. Viewing is restricted to authorised personnel. Camera monitors are located in an area where they are kept out of view of members, staff and visitors to SMRC

In accordance with data protection legislation, CCTV footage is retained for no longer than is necessary. All recordings are retained for approximately 28 days but the exact length of retention will vary as they are overwritten and the amount of recording in any given month will depend on the amount of activation by the motion detectors. but the exact. 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.

Camera operators shall act with utmost probity at all times and be mindful of exercising prejudices which may lead to complaints of the system being used for purposes other than those for which it is intended. Unauthorised copies of recordings shall not be made (e.g. by using a mobile phone).

1. Procedure for Handling Access Requests

Disclosure of images from the CCTV system is controlled and consistent with the purposes for which the system exists. All requests to access CCTV footage are channelled through the CCTV administrator. All access to images is logged.

2. Subject Access Requests

Individuals have the right to access their personal data including their image in CCTV recordings.

Requests shall be made in writing to the CCTV administrator, either by email or using a 'CCTV REQUESTS - Subject Access Request Form' (see below). Requests must include the date, time and location where the CCTV image was recorded. ID may be required. SMRC aims to respond promptly and at the latest within one month of receiving a valid request.

Downloading of footage is carried out by the CCTV administrator. Recorded material is handled with care and in a confidential manner to ensure complete regard for individual privacy. Footage is downloaded onto a DVD or memory stick; a copy is given to the requester and a copy is retained by SMRC in a secure location. Where CCTV images reveal other individuals, their faces are pixelated so that they are not recognisable. The footage in question is retained until the purpose for which it was downloaded has ended, at which point the footage is safely and permanently deleted.

Concerns regarding access to one's own personal data in CCTV footage can be raised with the President (smrcpresident@gmail.com). Individuals also have the right to submit a complaint to the Data Protection Commission.

3. Third-Party Access

3.1. Access Requests by An Garda Síochána

Access requests by An Garda Síochána shall be processed where such processing is necessary and proportionate for preventing, detecting, investigating or prosecuting criminal offences. Requests are approved by the CCTV administrator. Verbal requests are sufficient to allow for the viewing of the footage. However, verbal requests for copies of footage must be followed up with a formal written request using SMRC's 'CCTV REQUESTS – Third Party Request Form' (see below). A log is maintained of all requests by An Garda Síochána.

3.2. Other Third-Party Access

Disclosure of information to other third parties is made in strict accordance with the purposes of the system and is limited to the following authorities:

- CCTV administrators and the Club Officers*
- SMRC Officers involved with Institute grievance, disciplinary or dignity at work procedures**
- Legal or insurance representatives of data subjects (with written consent of data subjects)**
- SMRC's insurers/assessors**
- In exceptional cases, to others to assist in the identification of a victim, witness or perpetrator in relation to a criminal incident**
- CCTV companies for service/repair and to pixelate images***

* Access is logged

** Requests must be made in writing on a 'CCTV REQUESTS - Third Party Access Request Form' (see below). A decision to refuse such a request by the CCTV administrator may be appealed to the President.

*** Access is documented

11.0 Procedure for Requesting Installation of Additional CCTV Cameras

Requests for the installation of additional cameras on SMRC premises shall be made in writing (by email) by the CCTV Administrator to the Club Committee. A Data Protection Impact Assessment (DPIA) shall be carried out by the Committee considering why the privacy rights of individuals must cede, in a proportionate way, to achieve a legitimate objective. Approval will depend on a proven need, taking into account whether better solutions exist and the benefits to be gained from the additional cameras.

12.0 Procedure for Removal of CCTV Cameras

Where evidence shows that a CCTV camera location is no longer justified, the camera shall be removed at the request of the CCTV administrator and placed in storage until required.

13.0 Compliance with this Policy

All members who are responsible for implementing, managing, operating or using the CCTV system must do so only as authorised and in accordance with this Policy. Any failure to comply with this Policy may be a disciplinary offence.

CCTV REQUESTS

SUBJECT ACCESS REQUEST FORM

Details OF Requester

Name _____

Address: _____

Email _____ 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: CCTV Administrator – Kieran.kerr@gmail.com _____

Office Use Only	Date	TIME	WHO BY
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System Download Requested

Evidence/Authenticate:

Result:

Copied To Memory Stick:

Download Failed Report:

No. of Copies Made

B&E Ref No:

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:

Date Retained Copy Deleted

Copies Given To:

Date:

Signed _____ Date: _____

CCTV REQUESTS

Third Party 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 _____

Per Section 10.2.1 of this policy (An Garda Síochana only) _____

Per Section 10.2.2 of this policy For one of the purposes outline in Section 5.0 _____

Date of recording _____ Time of recording _____

Start Download (Time) _____ End Download (Time) _____

Location of Recording _____

Signed: _____ Date _____

Completed forms to: CCTV Administrator – Kieran.kerr@gmail.com _____

Office Use Only **Date** **Time** **Who By**

System Download Requested

Evidence/Authenticate:

Result:

Copied To Memory Stick:

Download Failed Report:

No. Of Copies Made _____

B&E Ref No: _____

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: _____

Date Retained Copy Deleted _____

Copies Given To: _____

Date: _____

Signed _____ Date: _____

Revision History

Date of this revision: 16/06/2022	
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Version Number/ Revision Number	Revision Date	Summary of Changes	Changes marked
1.0		Initial SMRC draft agreed	