



Augustinian Province of Ireland

CCTV POLICY

January 2021

CCTV:

The Augustinian Province of Ireland as a Data Controller processes the personal data of individuals through its use of Closed Circuit Television (CCTV) at its premises throughout the province. All recorded material is the property of the Augustinians. This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material.

The Augustinian Province of Ireland use CCTV for the following purposes...

- Security – to assist in providing for the security of members of the faithful, friars, staff, volunteers and visitors; to periodically monitor and protect Augustinian 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 of the faithful, friars, staff, volunteers 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 the Augustinian Province of Ireland.
- To assist the Augustinian Province of Ireland where its grievance, disciplinary or dignity at work procedures have been invoked. CCTV surveillance will not be used to monitor individuals but may be used to gather evidence where procedures are invoked.
- To enable the Augustinian Province of Ireland 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 Augustinian rules and regulations, these may be used as evidence.

The appointed Augustinian Data Processor for the maintenance and management of CCTV will carry out periodic spot checks and maintain a log of all checks and incidents.

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 its premises.

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 the Augustinian Province of Ireland and its users.

To prevent unlawful access, cameras are situated at entrances such as doors and gates. Where applicable cameras are focused directly on the access points and not on public roads, paths or private property. For Security reasons cameras are situated in the Church near money collection points and in Church shops and Mass offices. These cameras also alert Augustinian personnel in the event of an accident such as a fall or if someone is taken ill. Where possible, footage will be monitored to ensure that all friars, staff, volunteers, other, adhere to relevant health and safety regulations. Footage of findings in breach of health and safety regulation will be used in disciplinary investigations. In all areas, notices are clearly displayed stating that CCTV is in operation.

The technical specifications of the cameras are... (see Garda Guidelines on CCTV – www.garda.ie/cctv)

Only Augustinian authorized personnel have access to CCTV systems as well as the security service providers who installed and maintain the system (Data Processors). The Augustinian Province of Ireland has a Data Processing Agreement with the above which is reviewed on an annual basis. Retention of recordings in line with GDPR is set at 28 days and information is stored on a password protected hard-drive and on password protected cloud storage software. 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. A review of cameras surveillance capabilities and locations is conducted every six months.

Third Party Access:

Access to recordings may be viewed by An Garda Síochána for the purposes of preventing or investigating a crime and recordings can be taken away on receipt of a formal written request from a Garda Superintendent. Recordings are securely deleted at the conclusion of the investigation.

Disclosure of information to other third parties is made in strict accordance with the purposes of the system as outlined in this policy. Requests must be made in writing to the Provincial Office. A decision to refuse such a request may be appealed to the Provincial of the Order.

Streaming:

The Augustinian Province of Ireland uses a third-party streaming service, Church Services TV (CSTV), to provide live-streaming with the purpose of connecting and building communities around the world. Live-streaming allows people who are homebound, in hospital, nursing homes or living abroad to watch live masses, other celebrations or services and, thereby allow parishioners to stay connected.

Live-streaming does not capture and hold images except when the Parish requires a recording. There is no cost to a viewer to attend an on-line service. Through this service daily church ceremonies and family events such as baptisms, communions, weddings, funerals, concerts or other activities inside the church can be live streamed, recorded, downloaded. Authorized personnel only, are able to turn on or off the system, set up schedules and recordings and track viewer statistics. (see www.churchservices.tv/privacy-policy/ for more information).

The Augustinian Province of Ireland has entered into a Data Processing Contract with CSTV in order to comply with GDPR regulations as of May 2018. This contract specifically addresses our Streaming arrangements with CSTV. As highlighted by the Data Protection Commissioner *the GDPR emphasizes transparency, security and accountability by data controllers and processors, while at the same time standardizing and strengthening the right of European citizens to data privacy.*

- Live streaming does not capture and hold images except when the parish requires a recording
- The CSTV system is managed by the Augustinian Communications Office.
- Occasionally the OSA may want to record Church events for historical or important purposes and these will be retained on a permanent basis for our archive. Other recordings will be retained for a maximum of 90 days.
- The camera and related equipment on the Church premises is owned by the OSA. It was supplied for the purposes of live streaming, including the audio connection with the Church's amplification system. All recordings are owned by the OSA.
- CSTV use and store securely visitor's IP addresses to generate viewing statistics such as the total numbers of visitors by country and the time they spent visiting the site. (Cookies)
- OSA Churches will publish upcoming recordings in their newsletters, bulletins, websites, notice boards, social media or other communication channels to allow parishioners or visitors know in advance about recordings. Eg., "The following masses/services will be recorded and they can be viewed online on www.augustinians.ie for 90 days following the ceremony. After that time the recordings will be destroyed, however, exceptions may apply where there is a legitimate request or the recording is of an historical or important nature for our archive.
- Funeral recordings will be advertised on our website www.augustinians.ie and the local website.
- Celebrants of services will announce on the microphone to the congregation and visitors that live-streaming and recordings are taking place by welcoming viewers joining the service via the internet at the beginning of the mass or service and so the congregation hears the message.
- OSA will ask for written consent from regular volunteers or the parents/guardians of minors helping at the church whose images may appear on livestreamed ceremonies or recordings.
- Notifications will be placed on or near pews that are in the line of the camera where people can be seen on live streaming and recordings.