

The purpose of this policy is to regulate the use of CCTV and its associated technology in the monitoring of the environs of premises occupied by Dublin Simon Community. The policy also seeks to clarify the procedures pertaining to the monitoring, recording, storage and distribution of any footage captured on the CCTV system.

CCTV Purpose

The CCTV systems are installed in Dublin Simon Community premises for the purpose of enhancing the security of the building, its associated equipment and to create mindfulness among the occupants that a surveillance security system is in operation to deter bullying, crime, vandalism and theft. It is also used as an aid to health and safety and to the discharge of Dublin Simon Community's duty of care within and/or in the external environs of the premises at all times.

Property Department

The systems are maintained by the Property Facilities Department and faults, repairs, requests for additional coverage should be made through the Property Department.

Notification of CCTV in Operation

- All Dublin Simon Community properties and premises utilising a CCTV system should notify its staff, clients and visitors of its existence and purpose.
- In terms of notifying clients and visitors, appropriate signage should be displayed.
- This can be achieved by placing easily-read and well-lit signs in prominent positions. A sign at all entrances will normally suffice.
- The sign is a statement that CCTV is in operation as well as a contact details and phone number of a person to contact if they have any queries.
- In terms of staff, all new staff must be notified that CCTV is in operation in our buildings before they commence employment in a project or during their initial induction to the service. Existing staff will already have been made aware of the use of CCTV in Dublin Simon Community buildings through local Induction.

Responding to queries from An Garda Siochana

- On occasion, members of An Garda Siochana may request access to footage from Dublin Simon Community CCTV systems. These requests may or may not relate to incidents involving staff and clients of Dublin Simon Community.
- Regardless of the data subjects, all requests from An Garda Siochana must be dealt with in the same manner. This means that the same concept applies to requests for footage from cameras monitoring the outside of the building as it does for footage taken inside the building.
- If An Gardaí present in person to the project and would like to review footage, staff may do this with approval from the service manager or the on-call-manager. Staff on duty must take the Guard's name, badge number and the station that he/she is affiliated with. They must also record the activity on the service's CCTV log.
- If they would like the footage to be burned on to a disc/device they must submit their request in writing. This letter must contain details of what camera angle is required, the

time, date and nature of the request. They must also include their badge number and details of where they are stationed.

- All requests from members of An Garda Siochana to view or copy footage must relate to the protection against or prevention of crime. If you are unsure and would require further guidance or clarity this, contact the Quality & Practice office.

Responding to Access Requests from Data Subjects

- All data subjects have a right to request a copy of CCTV footage they are captured on under Data Protection legislation.
- If a client would like to view or copy footage involving them they may do so as per the Access Request procedure in the organisation's Data Protection Policy.
- A staff member must provide the client with an Access Request Form and assist them in filling it in.
- Once the form or written request is received, the staff member should photocopy it and keep a copy in the client's file. They must also provide the service manager with the other copy.
- The staff member and manager will meet to go review the requested footage and decide if it is appropriate to provide the client with the requested footage. This decision is made in consultation with the Data Protection Officer.
- The line manager will then write to the client and inform them of their decision. If the request is denied, the line manager must provide a clear explanation as to why.
- If the decision is made to provide the footage, the
- In the event that staff or volunteers would like access to footage regarding an incident that they were involved in, they must also follow the above procedure.

Responding to Third Party Requests

- On occasion there may other third parties who may want to access copies of CCTV footage. These can include social workers, insurance agencies or family members, visitors or members of the public.
- Any third party requests for footage are handled under the Data Protection procedure and requests must be made in writing to service manager.
- Letters should clearly state the location in the building, the date of the incident, some time parameters and their reason for wanting access to the footage.
- The Service Manager is then responsible for responding to the request within the 30 day limit for Access Requests.