



Closed Circuit Television Systems (CCTV) Policy

CCTV - Version 2
June 2023

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Closed Circuit Television Systems (CCTV) Policy

Offaly County Councils Closed Circuit Television Systems (CCTV) policy was formulated in May 2018. Offaly County Council is referred to in this Policy as “OCC”, “us” or “we”.

1. Introduction

This document sets out Offaly County Council’s Policy in relation to the use of CCTV. The Council undertakes to operate its CCTV and undertakes to ensure that those who operate CCTV on its behalf do so within the terms of this policy and the law and will review it regularly to ensure continuing compliance with the Data Protection and Freedom of Information Acts and Section 38 of the Garda Síochána Act, 2005 and this policy takes account of that. Measures to ensure the proportional use of CCTV cameras in the context of personal data are set out below.

2. Scope

This policy covers the use of CCTV systems under the control of Offaly County Council. This includes imagery captured by recording technologies such as fixed CCTV cameras, portable CCTV cameras, body worn cameras, dash cameras, mobile phone cameras, digital cameras, photography.

3. Purpose of Use

The Council considers the use of CCTV cameras, both internally and externally, to be an appropriate security measure to help protect buildings, facilities and other Council property and in certain circumstances for the prevention, detection or prosecution of offences.

Offaly County Council will use CCTV systems for:

- The security of premises and property;
- The monitoring of potential illegal activities such as littering and dumping;
- Promoting the health and safety of staff, visitors and contractors;
- Promoting the safety of the public in public places by deterring and preventing the incidence of crime and anti-social behaviour (including theft and vandalism).

Covert surveillance will only be used on a case by case basis where the data is kept for the purposes of preventing, detecting or investigating offences, or apprehending or prosecuting offenders. Covert surveillance will be focused and of short duration. Only specific (and relevant) individuals/locations will be recorded. If no evidence is obtained within a reasonable period, the surveillance will cease.

CCTV will not be used for monitoring employee performance.

Offaly County Council use of CCTV systems will be in accordance with data protection legislation.

4 Responsibility

- 4.1** The relevant Director of Services shall have overall responsibility for deployment and operation of CCTV systems used within their directorates.
- 4.2** If, having examined all other alternatives, it is decided that CCTV is the only suitable solution, then a clear operational objective for the system and each camera must be identified and an assessment on the impact on privacy shall be carried out (a Data Privacy Impact Assessment). A record of these decisions shall be retained for inspection and review. A copy of these documents shall be sent to the Council's Data Protection Officer.
- 4.3** Day-to-day supervision of CCTV systems shall rest with Heads of Section.
- 4.4** A designated staff member (Responsible Officer) shall be responsible for:
- (i) The day to day operation of the CCTV system within their charge and the security and accountability of all equipment and media used by their system.
 - (ii) Restricting access to any other staff to operate the equipment or view images without authorisation.
- 4.5** All requests for access to data must be directed via the designated Data Protection Liaison Officers (Point of Contact) in each department to the Council's Data Protection Officer.
- 4.6** All images will remain the property of Offaly County Council.

5 Processing of CCTV Images

5.1 All images shall be stored in a secure environment, to which access shall be restricted at all times except when:

(i) They are requested by the Garda authorities and the request is authorised by a member of at least the rank of Inspector. If the Gardaí require CCTV images for a specific investigation, it is up to the Council's Data Protection Officer to satisfy him/herself that there is a genuine investigation underway.

Refer to section 6.2 regarding policy and procedure in relation to requests by the Gardaí (or a law enforcement agency) for access to personal data from council records in relation to the prevention, detection or prosecution of offences;

(ii) They are requested through the judicial process;

(iii) A valid data access request has been received and authorised by Offaly County Council (e.g. Freedom of information, Data protection, Access to information on the Environment legislation);

5.2 Images will not be retained by Offaly County Council for longer than 30 days, unless required for the investigation of offences or evidential purposes. Equipment shall be timed to erase data automatically, where possible.

5.3 Only persons authorised by Offaly County Council shall be allowed access to the data collected by the CCTV system.

5.4 Copies of images will only be made by Offaly County Council in any of the following circumstances where:

- (i) A formal documented request is received from a member of An Garda Síochána confirming that the request is in respect of the detection or prosecution of an offence;
- (ii) The incident recorded is proceeding to court;
- (iii) A request for the image is received from the DPP;
- (iv) Repeated playing of the incident recorded is required (e.g. to show witnesses);
- (v) A copy is required in order to satisfy a subject access request (or a request at 5.1.1 (iii) above)

5.5 In the circumstances set out in Section 5.4, the original copy of data will be retained by Offaly County Council unless it is required:

- (i) For the purpose of court proceedings;
- (ii) By or under any other enactment;

5.6 Offaly County Council will document any removal and/or viewing of data, by recording the following:

- (i) Date and time on/at which the images were removed from the general system or viewed;
- (ii) The reason why they were removed from the system or viewed;
- (iii) Any crime incident number to which the images may be relevant;
- (iv) The location of the data images;
- (v) The name(s) of the person(s) viewing the images. (If this should include third parties, the name of the organisation to which the third party belongs);
- (vi) The signature of the collecting official, where appropriate, and the signature of the official signing out the data;
- (vii) The extent of the information to which access was allowed or which was disclosed
- (viii) The outcome, if any, of the viewing;
- (ix) The date and time the images were returned to the system or secure place, if they have been retained for evidential purposes;

5.7 Offaly County Council will ensure that all operators and employees with access to data will be made aware of and are trained in their responsibilities under this policy, notably:

- (i) Procedures for access to and removal of recorded images;
- (ii) The access and disclosure policy (including access by law enforcement agencies);
- (iii) The rights and responsibilities under the GDPR and Data Protection Act 2018;

5.8 The use of automatic facial recognition technologies is prohibited, pending any future revision of this policy in the light of data protection requirements.

5.9 Offaly County Council will regularly review whether the use of surveillance systems continues to be justified.

5.10 Offaly County Council will decide on the shortest period that needed to retain the information, based upon the purpose for recording it. This will be no longer than 30 days.

5.11 Offaly County Council will put measures in place to ensure the permanent deletion of information through secure methods at the end of this period.

5.12 Offaly County Council will ensure that control rooms and rooms where information is stored is secure.

5.13 Offaly County Council will ensure that any software updates (particularly security updates) published by the equipment's manufacturer that need to be applied to the system, will be applied in a timely manner.

6 Access to and Disclosure of Images to Third Parties

6.1 Access to data will be restricted to designated staff only. All access to the medium on which data is recorded will be documented by the designated member of staff acting on the Council's Data Protection Officer's behalf.

6.2 Disclosure of recorded data to third parties will only be made by Offaly County Council in limited and prescribed circumstances:

- (i) The handing over of CCTV footage to the Gardaí. This will be carried out on foot of a formal written communication from the Gardaí, confirming that the material is sought for the prevention, investigation or detection of a crime.

For practical purposes in cases of urgency, a phone call to the requesting Garda's station may be sufficient, provided that a member in the District Office, the station sergeant or a higher ranking officer is spoken to, as all may be assumed to be acting with the authority of a District/Divisional officer in confirming that an investigation is authorised. This should be followed up with a formal written communication as above. A log of all such requests shall be kept.

A request by a member of an Garda Síochána to view CCTV footage, as opposed to obtaining a copy of the footage, does not require written communication or a call to the Garda station so long as it is confirmed by the requesting Garda that viewing the footage is for the purposes of investigation or detection of a crime;

- (ii) people whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal inquiries or criminal proceedings);
- (iii) a requirement under any enactment, rule of law or court order to disclose the images;
- (iv) if required by Offaly County Council's legal representatives;

The release of images to the media in a criminal investigation is solely within the remit of An Garda Síochána. The Council shall not release data to the media.

6.3 All requests for access to CCTV data will be recorded by Offaly County Council in accordance with the Data Subject Access Request Policy. All such requests must be channelled through the Data Protection Officer. If access or disclosure is denied, the reason will be documented.

6.4 If access to or disclosure of the CCTV data is allowed, it will be documented in accordance with item 6.1 and 6.2 of this policy.

6.5 Where the images are determined to be personal data:

- (i) Any video footage or stills which include images of persons other than the data subject/requester shall be disguised or blurred so that they are not readily identifiable;
- (ii) The images of individuals may need to be disguised or blurred so that they are not readily identifiable, if it is decided by An Garda Síochána that data will be disclosed to the media;

6.6 If the system does not have the facilities to carry out that type of editing, a third party or company may need to be hired to carry it out.

6.7 If a third party or company is hired, then the designated member of staff will ensure that:

- (i) there is a contractual relationship between Offaly County Council and the third party/company;
- (ii) that the third party/company has given appropriate guarantees regarding the security measures they take in relation to the images;
- (iii) Offaly County Council shall have in place appropriate and adequate procedures to ensure those guarantees are met including a right of access to the third party/company's premises or systems;
- (iv) the written contract makes it explicit that the editing company can only use the images in accordance with the instructions of Offaly County Council.
- (v) the written contract makes the security guarantees provided by the editing company explicit.

7 Access by Data Subjects

7.1 All requests by data subject for access to the data are to be made via the Data Protection Officer. If a request comes to any staff member it should be immediately passed onto the Data Protection Officer.

7.2 Data subjects will be provided with a standard data subject access request form – where possible they may submit:

(a) further information, such as date, location, timeframe, in order to locate the images requested; (Requesters should be aware that CCTV footage is usually deleted within thirty days of being recorded)

7.3 The designated member of staff (responsible officer) will locate the images requested, if possible.

7.4 The designated Data Protection Officer will provide a written response to the individual within 30 days (at maximum) of receiving a valid request, setting out their decision on the request.

7.5 If it is decided that the request will not be granted, the reasons will be provided in the response to the requester.

7.6 A copy of the request and response will be retained and filed securely.

7.7 The Data Protection Officer will retain the following documentation:

- the request from the individual;
- the decision;
- the response to the request from the individual;
- the reason for rejection, if applicable.

7.8 The Data Protection Officer will determine whether disclosure to the individual would entail disclosing images of third parties.

7.9 If third party images are not to be disclosed, the designated Data Protection Officer shall arrange for the third party images to be disguised or blurred.

7.10 If the system does not have the facilities to carry out the type of editing required, a third party or company may be hired to carry it out.

7.15 If a third party or company is hired, then the Data Protection compliance officer will ensure that the requirements under section 6.7 of policy have been applied.

7.16 There will be a mechanism and procedure for a person to lodge a complaint about the CCTV system. Complaints will be documented and will be dealt with via the Customer complaints process in conjunction with the Data Protection Officer and the designated staff members & Director of Services as appropriate.

8 Covert Surveillance

Offaly County Council will not normally engage in covert surveillance. However, such surveillance may on occasion be required and justified where overt surveillance would merely transfer any illegal activity to some other location where CCTV is not in place. For example, illegal dumping at specific locations could justify covert surveillance, subject to this policy.

Where An Garda Síochána requests to carry out covert surveillance in Council property, any request will be in writing.

9 Notification & Signage

The Council will place this policy on its Intranet for the information and adherence of staff and on its website www.offaly.ie for the information of the public.

Adequate CCTV signage will be placed at locations where CCTV camera(s) are sited, including at entrances to Council offices and property as well as advance notices indicating the use of CCTV. Signage may include the name and contact details of the Council's Data Controller as well as the specific purpose(s) for which the CCTV camera is in place in each location.



Comhairle Chontae Uíbh Fhailí
Offaly County Council



TCI i bhfeidhm / CCTV in operation

I gcomhair coiriúlacht a chosc agus sábháilteacht an phobail

For crime prevention and public safety

Coimeádtar sonraí ar feadh 30 lá

Details held for up to 30 days

Rialaitheoir sonraí: Comhairle Chontae Uíbh Fhailí

Data Controller: Offaly County Council

www.offaly.ie

dpo@offalycoco.ie / 057 9346800

Appropriate locations for signage may include:

- entrances to premises, i.e. external doors and entrance gates
- reception areas
- at or close to each internal camera

As part of this policy the Council may regularly publicise the fact that staff may use video and audio recording devices during the course of their work. Such staff, when using such equipment, must advise persons approaching them that the interaction is being recorded by way of video and audio.

10 Responsibilities of security companies

10.1 Security companies that place and operate cameras on behalf of Offaly County Council are considered to be "Data Processors". As data processors, they operate under the instruction of Offaly County Council. Article 28 of the GDPR places a number of obligations on data processors.

These responsibilities include:

- having appropriate technical and organisational measures in place so that processing will meet the requirements of GDPR; that is
- security measures in place to prevent unauthorised access to images
- security measures in place to prevent unauthorised alteration, disclosure or destruction of the data
- security measures in place to prevent in particular where the processing involves the transmission of data over a network
- security measures in place to prevent all unlawful forms of processing
- Ensuring staff of the security company are made aware of their obligations relating to the security of data

All security companies who process data on behalf of Offaly County Council shall complete a CCTV Detail form *{Appendix 2}* together with Offaly County Council's Non Disclosure *{Appendix 3}*.

All security companies who process data on behalf of Offaly County Council must enter into a Data Processing Agreement with the Council.

11 Effective Date

This policy was originally adopted by Offaly County Council in May 2018.

Definitions

As with any legislation, certain terms have particular meaning. For the avoidance of doubt, and for consistency in terminology, the following definitions will apply within this Policy. The following are some useful definitions:

Access Request – This is where a person makes a request to the organisation for the disclosure of their personal data under Section 3 and / or Section 4 of the Data Protection Acts.

Audio recording - The use of equipment for recording of voice and sound.

CCTV – Closed-circuit television is the use of video cameras to transmit a signal to a specific place on a limited set of monitors. The images may then be recorded on video tape or DVD or other digital recording mechanism. It includes in this policy the recording of sound.

Data - information in a form that can be processed. It includes automated or electronic data (any information on computer or information recorded with the intention of putting it on computer) and manual data (information that is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system).

Data Controller - a person who (either alone or with others) controls the contents and use of personal data.

Data Processing - performing any operation or set of operations on data, including:

- Obtaining, recording or keeping the data,
- Collecting, organising, storing, altering or adapting the data,
- Retrieving, consulting or using the data,
- Disclosing the data by transmitting, disseminating or otherwise making it available,
- Aligning, combining, blocking, erasing or destroying the data.

Data Processor - a person who processes personal information on behalf of a data controller, but does not include an employee of a data controller who processes such data in the course of their employment, for example, this might mean an employee of an organisation to which the data controller out-sources work. The Data Protection Acts place responsibilities on such entities in relation to their processing of the data.

Data Protection Acts – The Data Protection Acts, 1988-2018 confer rights on individuals as well as responsibilities on those persons handling, processing, managing and controlling personal data. The Council must comply with the provisions of the Data Protection Acts when collecting and storing personal information. This applies to personal information relating both to employees of the organisation and individuals who interact with the organisation

Data Subject – an individual who is the subject of personal data.

Personal Data – Data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.

Appendix 1



Request for a copy of Personal Data

General Data Protection Regulation and Data Protection Act 2018

Please complete all parts:

| | | |
|---|---|--|
| 1 | Full Name | |
| 2 | Postal Address (preferably including Eircode) | |
| 3 | Telephone Number: | |
| 4 | Email Address: | |
| 5 | Please outline details of the data sought. | |
| 6 | To assist us in locating the data requested, please indicate the location within Offaly County Council, where you believe your personal data may be in existence. | |
| 7 | Please indicate the time period for which the data being sought relates to. | |
| 8 | Please provide any previous reference numbers relating to your contact with Offaly County Council | |

Verification of Identity

In order for us to verify your identity, please provide the following information. A copy of Photo ID i.e. Passport or Driving Licence and a copy of a recent Utility Bill or Government letter issued within the last six months to your current address.

I,..... [insert name] declare that all the details I have provided in this form are true and complete to the best of my knowledge.

Signed: _____ Date: _____

Please return this form to: **Data Protection Officer, Offaly County Council, Áras an Chontae, Charleville Road, Tullamore, Co. Offaly. R35 F893** or by e-mail to dataprotection@offalycoco.ie.

Further information on Data Protection Subject Access Requests can be found on the website of the Data Protection Commission – www.dataprotection.ie

Checklist

Have you:

- | | |
|--|--------|
| 1. Completed the Subject Access (SAR) Request form in full - | YES/NO |
| 2. Signed and dated the Declaration on the SAR form - | YES/NO |
| 3. Included an appropriate form of Photo ID - | YES/NO |
| 4. Included a copy of a recent utility bill or Government letter - | YES/NO |
| 5. Included letter of consent to Solicitor (where applicable) - | YES/NO |

If you have ticked *No* to any question below we regret we cannot process your request.

Privacy Statement

Offaly County Council processes all personal information in accordance with the General Data Protection Regulation and the Data Protection Acts, 1988 to 2018. Further information in relation to this is available on our website at: <https://www.offaly.ie/eng/Privacy-Statement>

Appendix 2



Security Company CCTV Report - To be completed by Security Company

| | | |
|----|--|--|
| 1 | Is the company licenced by the PSA (Private Security Authority)? | |
| 2 | How many locations have CCTV cameras? | |
| 3 | How many cameras are installed? | |
| 4 | Are signs erected? If so, Please return copy of same to Data Controller | |
| 5 | Where are the images stored? | |
| 6 | Who has access to the images? | |
| 7 | What is the overwriting cycle on the images? | |
| 8 | What is the recording medium? | |
| 9 | What is the name of the security company that installed the system? | |
| 10 | What is the name of the security company who has access to the imagery on the system? | |
| 11 | Is the company in (10) above registered with the Data Protection Commissioners as a data processor? | |
| 12 | What is the name and contact details of the person to liaise with the Data Controller? | |
| 13 | What measures has the security company in place to prevent unauthorised access to images? | |
| 14 | What measures has the security company in place to prevent unauthorised alteration, disclosure or destruction of the data? | |

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| 15 | What measures has the security company in place to prevent in particular where the processing involves the transmission of data over a network, e.g. encryption? | |
| 16 | What measures has the security company in place to prevent all unlawful forms of processing? | |
| 17 | Have the staff of the security company been made aware of their obligations relating to the security of data? | |

Please note that all requests for access to CCTV images must be processed through the Data Controller i.e. Offaly County Council. In the event of such a request from An Garda Síochána, it is up to the data controller to satisfy itself that there is a genuine investigation underway. For practical purposes, in cases of urgency a phone call by the Data Controller to the requesting Garda's station may be sufficient. In all situations however, it is advised that the disclosure of such recordings is best handled in response to a formal written communication from the Gardaí indicating that the material is sought for *“the purposes of preventing, detecting, investigating or prosecuting criminal offences”*, as per Section 41(b) of the Data Protection Act 2018.

Note: Data Controller is Offaly County Council.

Data Protection Officer details: **Data Protection Officer, Offaly County Council, Áras an Chontae, Charleville Road, Tullamore, Co. Offaly. R35 F893 or e-mail to dpo@offalycoco.ie.**

| | |
|----------------|--|
| Signed: | |
| Print Name: | |
| Position Held: | |
| Phone Number: | |
| Email Address: | |
| Date: | |

This form must be signed and accompanied by a signed copy of Offaly County Council's non-disclosure agreement.

Appendix 3



Mutual Non-Disclosure Agreement

Between: _____ **and** _____
Offaly County Council _____
Áras an Chontae, Charleville Road, _____
Tullamore, _____
Co Offaly. R35 F893 _____

Whereas either party above may at any time be defined as a "*Discloser*" or a "*Recipient*" of confidential and personal information, the *Discloser* is willing to disclose to the *Recipient* for the *Permitted Purpose* as defined below.

It is now agreed

1. Definition

"Confidential & personal Information" means any and all personal data and confidential information disclosed by the *Discloser* to the *Recipient* including any documentation marked confidential.

"Permitted Purpose" means for the purpose of providing an agreed service and or contract to Offaly Co Council.

2. Confidentiality Undertaking

The *Recipient* shall strictly maintain the confidential information which shall be used solely for the Permitted Purpose and not otherwise. The Confidential Information may not be disclosed to any other parties without the prior permission of Offaly Co Council. All documents and materials (including electronic media) originating with the *Discloser* shall remain the property of the *Discloser*. At the request of the *Discloser* the *Recipient* shall return all such documents and materials (including electronic media) and shall not keep any copies of them.

3. Limitation of Secrecy Obligation

The obligation of the *Recipient* set forth in Clause 2 shall not apply to any information

which the *Recipient* can show:-

- (i) was in the public domain at the time of the disclosure or which subsequently entered the public domain except by breach of this Agreement,
- (ii) Was lawfully in the possession of the Recipient at the time of the disclosure
- (iii) Is subsequently obtained by the Recipient from a person owing no duty or confidence to the *Discloser*.

4. Law and Jurisdiction.

This agreement shall be construed and understood in accordance with Irish Law and the parties hereto submit to the non-exclusive jurisdiction of the Irish Courts.

For guidance purposes only, the following are a list of Irish legal acts that relate to the use and abuse of personal and confidential information.

- Copyright Act 2000
- Criminal Damage Act 1991
- Data Protection Acts 1988- 2018
- Freedom of Information Act 2014

The use of personal & confidential data must comply with all relevant legislation.

5. Termination

This " NDA" is intended to cover " Confidential & personal Information" received by the " Recipient" both prior to and subsequent to the date of this "NDA". This "NDA" will terminate upon the completion or termination of the parties' business relationship.

Signed for and on behalf of:

1. Offaly Co Council

2. _____

Print Name

Print Name

Date

Date

Appendix 4



CCTV: Log of requests to access system/view/download copies of material

Section Heads are responsible for ensuring CCTV access logs are maintained

| <p>Nature of Request:</p> <p>Garda Request to view data: <i>Requesting Garda must confirm viewing is to investigate/detect a crime/incident.</i> <i>(Name and signature of Garda, Garda ID number and PULSE reference number required).</i></p> <p style="text-align: center;"><u>OR</u></p> <p>Data Subject Access Request <i>Has a valid Data Access Request been received? (see Appendix 1 of CCTV Policy)</i></p> | <p>Date and time the images were viewed/copied (please specify)</p> | <p>Details of footage required including date and time</p> | <p><i>Downloading a copy:</i></p> <p><u>For Gardaí:</u> <i>1. Has formal Garda Síochána written request been received?</i> <i>2. Has OCC's DPO been informed?</i> <i>3. Have Gardaí supplied an encrypted device</i></p> <hr/> <p><u>For DSAR</u> <i>Supplied footage must comply with GDPR principles e.g. redaction/pixelation where appropriate</i></p> | <p>Downloading of data for a 3rd party transfers responsibility for that data to the 3rd party</p> <p style="text-align: center;"><u>You are now Data Controller for this data</u></p> <p style="text-align: center;"><u>SIGNATURE OF ACCEPTANCE REQUIRED</u></p> | <p>Name, position and signature of OCC's staff member present</p> |
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Appendix 5



Inventory of CCTV Systems

| Location | No. of Cameras | Storage Location | Authorised Access By | Overwriting Cycle | Media Type |
|----------|----------------|------------------|----------------------|-------------------|------------|
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Appendix 6



Register of persons in section with access to CCTV system

*It is the responsibility of the **section head** to ensure that there is an adequate number of staff with the necessary training within the section to access CCTV systems under their remit.*

Details of how to access the system must be securely stored.

Section:

Location of CCTV Cameras:

| Name and position of staff member with access to CCTV system: |
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