



CUMANN LÚTHCHLEAS GAEL

CARN DOMHNAIGH

Co. Dhun na nGall



CLOSED CIRCUIT TV (CCTV) POLICY

Policy on CCTV Systems and Data Management

The ClosedCircuit Television System (CCTV) is installed in Carndonagh GAA Club under the remit of the Executive Committee.

Purpose of the Policy

The purpose of this policy is to regulate the use of CCTV and its associated technology in the monitoring of the environs of premises under the remit of the Executive Committee of Carndonagh GAA Club.

Purpose of the CCTV System

The CCTV system is installed internally and externally in premises for the purpose of enhancing security of the building, pitches, ball alley/Astroturf, car park and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation to deter bullying, crime, vandalism and theft, as an aid to Health and Safety and to the discharge of the club's duty of care within and/or in the external environs of the premises at all times.

Scope of this policy

This applies to all personnel in and visitors to Carndonagh GAA Club. It relates directly to the location and use of CCTV, the monitoring, recording and subsequent use of such recorded material.

General Principles

The Executive Committee of Carndonagh GAA Club, as the corporate body, has a statutory responsibility for the protection of the club property and equipment as well as providing a sense of security to its employees, members and invitees to its premises. Carndonagh GAA Club owes a duty of care under the provision of Health, Safety and Welfare legislation and utilises CCTV systems and its associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life in Carndonagh GAA Club by integrating the best practices governing the surveillance of its premises, including using any evidence obtained in any disciplinary issue.

The primary aim of the CCTV monitoring of Carndonagh GAA Club premises is to deter crime and vandalism and to assist in the protection and safety of the said property and its associated equipment and materials.

Monitoring for security purposes will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies and personnel for other purposes is prohibited by this policy. For example CCTV monitoring of political or religious activities, or employee and/or member evaluations would undermine the acceptability of the resources for use regarding critical safety and security objectives and is therefore prohibited by this policy.

Information obtained through video monitoring may only be released when authorised by the Chairperson of the Executive Committee.

CCTV monitoring of public areas, for security purposes, will be conducted in a manner consistent with all existing policies adopted by the Executive Committee including the provisions set down in Equality and other Sports & Education related legislation.

The industry code of practice for video monitoring prohibits monitoring based on the classifications contained in Equality and other related legislation e.g. gender, marital status, family status, sexual orientation, religion, age, disability, race or membership of the Traveller community.



CUMANN LÚTHCHLEAS GAEL

CARN DOMHNAIGH

Co. Dhún na nGall



Video monitoring of public areas, for security purposes, within the said establishment, is limited to areas that do not violate the reasonable expectation to privacy as defined by law.

Data from the CCTV system will be accessed and used in accordance with Data Protection Regulations.

Cameras will be located in the following areas:

Internal

- Stair Well
- Sports Hall

External

- On main building and fixed on gate
- On main building covering front car park
- On main building covering west facing side of building
- On sports hall covering rear of main building
- On rear of sports hall covering work shed
- On work shed covering door 1

Employees, Members and parents/guardians will be informed of the location and purpose of the CCTV system as outlined above. The right to access images captured by CCTV cameras shall be in accordance with the Data Protection Acts 1988, 2003 & the General Data Protection Regulation EU/2016/679 which confer rights on individuals as well as additional responsibilities on those persons and organisations processing any personal data.

Data Protection

All personal data recorded and stored by the CCTV system is governed by the Data Protection Acts of 1998, 2003 & the General Data Protection Regulation EU/2016/679. Under the Data Protection Acts a data controller is the individual or the legal person who controls and is responsible for the keeping and use of personal information in manual files or in a computerised form. The data controller in respect of images recorded and stored by the CCTV system in the club is the Chairperson on behalf of the Executive Committee.

The personal data recorded and stored by the CCTV system will only be available to the data controller and will be used only for the purposes outlined on the signage.

Individuals whose images are recorded and stored by the CCTV system shall have the right to request and receive a copy of personal data processed by the system. Such requests shall be made in writing to the data controller and shall be complied with within a maximum of 28 days. Personal data recorded by the CCTV system shall be retained for a maximum of 28 days. Thereafter it will be deleted automatically.

The recorded footage and the monitoring equipment shall be securely stored in a locked press in the storage room, and no unauthorised access is permitted at any time.

The following procedures shall be followed in the event that An Garda Síochána seeks to view or take a copy of CCTV footage from the club's CCTV systems:

1. The data controller shall satisfy himself/herself that there is an investigation underway.
2. A request from An Garda Síochána must be made in writing on Garda headed notepaper.

All CCTV systems and associated equipment will be required to be compliant with this policy.



CUMANN LÚTHCHLEAS GAEL

CARN DOMHNAIGH

Co. Dhún na nGall



Responsibilities:

The Executive Committee will:

- Ensure that a policy is in place, compliant with relevant legislation, to govern the use of CCTV in the club.
- Ensure this policy is reviewed regularly by the Executive Committee.

The Chairperson will:

- Act as Data Controller on behalf of the Executive Committee.
- Ensure that the use of the CCTV system is used in accordance with the policy set down by the Executive Committee.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the club grounds.
- Ensure that all CCTV monitoring systems are compliant with this policy.
- Be responsible for the release of any information or material in compliance with this policy.
- Maintain a record of the release of any material recorded or stored on this system.
- Provide a list of the CCTV cameras, their locations and the associated monitoring equipment and the capabilities of such equipment to the Executive Committee for formal approval.
- Ensure that all areas being monitored are not in breach of a reasonable expectation of the privacy of individuals within the club.
- Advise the Executive Committee to ensure that adequate signage, at appropriate and prominent locations, is displayed.
- Ensure that recorded material is retained for a period not longer than 28 days and will be erased unless required as part of a criminal investigation or court proceedings, criminal or civil, or other bona fide use as approved by the Executive Committee.
- Ensure that monitors are stored in a secure place with access by authorised personnel only.

Communication

- This policy will be available for view by all club members.

Participation & Review

- This policy was ratified by the Club Executive Committee on 12 October 2021 and will be reviewed on an annual basis.

Signed by:

Joanne McKinley

Date:

12 October 2021



CUMANN LÚTHCHLEAS GAEL

CARN DOMHNAIGH

Co. Dhún na nGall



APPENDIX 1 – GLOSSARY

TERM	DEFINITION
Data	Information in a form that can be processed. It includes both automated and manual data
Automated Data	Any information on computer or information recorded with the intention of putting it on a computer. It includes not only structure databases but also e-mails, office documents and or CCTV footage / images
Manual Data	Information that is kept as part of a relevant filing system, or with the intention that it should form part of a relevant filing system – this includes temporary folders.
Data Controller	A person who (either alone or with others) controls the contents and use of personal data. A data controller is the individual or the legal person who controls and is responsible for the keeping and use of personal information on computer Or, in structured manual files.
Data Processor	A person who processes personal data on behalf of a data controller but does not include an employee of a data controller who processes such data in the course of his employment. If an organisation or person holds or processes personal data, but does not exercise responsibility for or control over the personal data, then they are deemed to be a "data processor".
Data Protection Officer (DPO)	An ISI appointed officer with responsibility for the Data Protection compliance of the organisation.
Data Subject	A data subject is an individual who is the subject of personal data that is held by a data controller or processed by a data processor
GPDR	The new EU General Data Protection Regulation (GDPR) - Regulation 2016/679 which comes into effect in May 2018 and replaces the current Data Protection Directive 95/46/EC and the Irish Data Protection Act(s).
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
Sensitive Data	Any personal data relating to a person's racial origin; political opinions or religious or other beliefs; physical or mental health; sexual life; criminal convictions or the alleged commission of an offence; trade union membership
Processing	Processing means performing any operation or set of operations on data, including: <ul style="list-style-type: none">• Obtaining, recording or keeping data;• Collecting, organising, storing, altering or adapting the data;• Retrieving, consulting or using the data;• Disclosing the information or data by transmitting;• Disseminating or otherwise making it available; Aligning, combining, blocking, erasing or destroying the data