**MUNTERCONNAUGHT COMMUNITY DEVELOPMENT**

**ASSOCIATION CLG**

**SUPERKIDS**

**CCTV POLICY & PROCEDURES**

**January 2024**

**Introduction:**

The purpose of this policy is to regulate the use of Closed-Circuit Television (CCTV) and its associated technology, monitoring both the internal and external environs of the Ballydurrow Community Centre (the Centre). Responsibility for the operation, maintenance and management of the Centre rests with Munterconnaught Community Development Association clg.

MCDA’s use of CCTV shall be in compliance with the Data Protection Acts 1988 to 2018 and the General Data Protection Regulations 2018.

**Data Controller:**

The Data Controller is Munterconnaught Community Development Association clg, Ballydurrow Community Centre, Ballydurrow, Virginia, County Cavan. The email address is [info@munterconnaught.ie](mailto:info@munterconnaught.ie).

**Scope:**

This policy is relevant to staff, children attending the preschool, SuperKids, and their parents/guardians, other users of the Centre, contractors and other visitors.

The purposes of the CCTV system are to:

* Provide a safe and secure environment for staff, children attending the preschool and their parents/guardians, other users of the Centre, contractors and other visitors;
* Protect the Centre and assets held in it both during and outside normal hours (CCTV cameras will be in operation 24 hours a day, every day); and
* Deter, prevent and detect crime, vandalism and anti-social behaviour.

**Warning Signs:**

Warning signs are displayed both inside the Centre and externally.

**Location of Cameras and Coverage:**

As regards the location of cameras, MCDA has endeavoured to ensure maximum effectiveness and efficiency; however, it is not possible to guarantee that the system will cover or detect every single incident which takes place internally or externally.

Cameras have been located as far as is possible so that they only capture images relevant to the purposes for which they were installed. MCDA has made every effort to restrict camera coverage to inside the Centre and the grounds of the Centre so that coverage, as far as is practicable, does not intrude into the properties of others or into public areas.

**Operation of the System:**

The system is operated by MCDA and its Directors and can only be accessed by the Directors and the Company Secretary of MCDA.

**Storage and Retention of Data:**

The data captured from CCTV cameras is securely stored as electronic data. It will be retained for a period of 30 days. After that period, it will be erased. However, there may be occasions where it is necessary to hold data for a longer period where, for example, a Subject Access Request has been made, an incident identified or time is required to enable An Garda Siochana to collect relevant images. All such retained image(s)/footage will be stored securely.

**Disclosure of Data:**

Any person whose image has been captured has a right to be given a copy of the information recorded, always providing that such an image/recording exists (i.e., that it has not been erased) and provided that an exemption/prohibition does not apply to the release. To exercise that right, a person must make an application (a Subject Access Request) in writing or by email to MCDA, providing proof of identity and address and giving a reasonable indication of time, date and location of the image(s)/footage being requested. If the person is under eighteen years of age, the parent(s) or guardian(s) may make an application.

MCDA will respond within 30 days of receiving an application.

In other circumstances CCTV data may also be accessed by/disclosed to:

* Following a request by An Garda Siochana (if verbally, to be confirmed subsequently in writing) when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place in or on MCDA property. An Garda Siochana becomes the Data Controller in respect of any images/footage disclosed to An Garda Siochana;
* To individuals (or their legal representative) subject to a court order; and
* To an insurance company providing cover to MCDA where the image(s)/footage are necessary to pursue a claim.

MCDA will adhere to the following guidelines in relation to disclosure:

* The disclosure will be managed by a Director of MCDA;
* A log will be kept of every disclosure recording full details of the person receiving the data, the reason for disclosure, the person copying the data and the date, time and location of the images/footage;
* The method of disclosing image(s)/footage should be secure to ensure that they are only seen by the intended recipient;
* Images of third parties not relevant to the reason for disclosure should be obscured, where possible, to prevent unnecessary identification; and
* The right to refuse to access to CCTV footage where this would jeopardise the rights of other individuals or jeopardise an ongoing investigation.

**Review of Policy:**

This policy will be reviewed and updated regularly to take account of changes in Data Protection legislation and guidelines.