

## **SMA Notice on the USE of CCTV and WEBCAMS**

The Society of African Missions has a Data Protection Policy that covers the use of CCTV and Webcams (live-streaming of Mass etc.). This notice gives helpful summary information.

### **1 Purpose**

#### **1.1 CCTV**

We use CCTV for security purposes; to protect premises and assets; to deter crime and anti-social behaviour; to monitor areas in which cash and / or goods are handled; to provide a safe environment for all personnel and visitors; for verification purposes and for dispute-resolution, particularly in circumstances where there is a dispute as to facts and the recordings may be capable of resolving that dispute; for the taking of legal action and the defence of litigation; and to assist in the investigation, detection, and prosecution of offences.

CCTV is **not** used to monitor the work-performance of employees.

CCTV recordings will be shared with An Garda Síochána for the investigation, detection and prosecution of offences.

CCTV recordings will be given to SMA's insurers and legal advisors for the taking and defence of legal claims.

#### **1.2 Webcams / Live streaming**

Masses, Novenas and special services are live-streamed via our website [www.sma.ie](http://www.sma.ie) facilitated by our data processor Church Services TV, 1st Floor Office Suite, 21 Dublin Road, Bray, Co. Wicklow A98 Y6YO. 01-6077150.

These services are to facilitate the sick and housebound joining in our daily Mass and other liturgies.

### **2 Location and signs**

Clear and prominent signs are prominently displayed alerting people to the presence of cameras (CCTV cameras, or webcams).

#### **2.1 CCTV**

We use CCTV at the front gates, in the car park, and at certain internal points within SMA buildings. CCTV signs are prominently displayed to alert people that CCTV is in operation. Cameras are positioned in such a way that they do not capture passers-by in public areas (e.g. people walking past on the street) and do not capture other people's private property.

CCTV is not used in areas where people have a reasonable expectation of privacy (e.g. staff rest areas, bathrooms, changing areas etc.). SMA does not engage in any form of "covert" recordings.

All CCTV camera locations are appropriately marked with prominent signs.

#### **2.2 Webcams / Livestreaming**

Webcams are installed in St. Joseph's SMA Church, Blackrock Road, Cork, and St. Joseph's SMA Church, Wilton, Cork, for the purposes of transmitting Mass, religious services and parish events via the internet.

Signs are prominently displayed in the Church porch and internally within the Church to alert parishioners and visitors that the service is being live-streamed and / or recorded to be shown on our website, and letting them know the location of the camera. We have undertaken a review of the positioning of cameras to ensure that all mitigation measures have been taken to minimise any potential intrusion into the privacy of those attending Mass. The camera is positioned to capture only the altar area, and people at the altar.

Those participating in activities at the altar: If Altar servers, Ministers of the Word, Extraordinary Ministers of the Eucharist, Cantors etc. are under 18 years, then **Consent forms** are signed by their parents.

### 3 Legal basis

3.1 **CCTV:** SMA relies upon its legitimate interests for CCTV.

3.2 **Webcams / Livestreaming:** The camera zoom is focused on the Altar. Those participating regularly in liturgies have been made aware of the presence of cameras which may be live and / or recording.

**Baptism:** When a family is bringing forward a child for baptism, they will be requested to sign a form stating that they consent to the baptismal liturgy being livestreamed and / or recorded. If objections are raised, then the livestream will be switched off.

**Schools:** Arrangements regarding the use of webcams / livestreaming, including switching off the livestreaming by request of the school, will be established with each school separately and reviewed annually. The Parish Priest will be responsible for the arrangements.

### 4 Retention of recorded images

Images must be retained for no longer than is necessary with regard to the purpose for which it was collected:

4.1 **CCTV:** CCTV images are retained for 28 days if no issue arises. However, if an issue arises (e.g. theft, burglary, assault etc), then the recordings are carefully preserved for transfer to An Garda Síochána and to transfer to SMA's insurance company and legal advisors.

4.2 **Webcams:** Webcam livestreams are deleted from the SMA server within 7 days of the footage being streamed unless other time spans are requested.

### 5 Storage of recorded images

CCTV images / recordings are stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Parish Priest / House Leader. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

CCTV recordings will be shared with An Garda Síochána if it is necessary for the purposes of detecting, investigation, and prosecuting offences. Gardaí will be asked to produce a letter per Section 41(b) Data Protection Act 2018 confirming that An Garda Síochána require a copy of the relevant data for the purposes of detecting, investigating and prosecuting offences. That letter shall be on An Garda Síochána letter-headed notepaper and signed by a member of the Garda Síochána not below the rank of chief superintendent. That letter shall be retained for audit and verification purposes.

In exceptional situations there could be extreme urgency to the Gardaí's request. For example, if the Gardaí explain that there is extreme urgency to the situation (i.e. danger to other members of the public, hot pursuit, a child protection issue etc etc) and that there is insufficient time to procure a section 41(b) letter (or that waiting to procure a section 41(b) letter would put the life or safety of others at risk), the SMA will release a copy of the CCTV footage, and / or permit An Garda Síochána to view the footage, on the basis of an undertaking that the section 41(b) letter will follow as soon as possible. The House Leader in each SMA community maintains a log detailing all the particulars of any requests from An Garda Síochána.

### 6 Your rights

You have the following rights:

(a) **Right to complain to supervisory authority.** Their contact details are set out below:

Telephone: +353 57 8684800 +353 (0)761 104 800/Lo Call Number 1890 252 231

E-mail: [info@dataprotection.ie](mailto:info@dataprotection.ie)

Postal Address:

Data Protection Commission, Canal House, Station Road, Portarlinton, R32 AP23 Co. Laois

- (b) **Right of access.**
- (c) **Right to rectification.**
- (d) **Right to erasure** (right to be forgotten).
- (e) **Right to restrict processing.**
- (f) **Right to data portability.**
- (g) **Right to object.**

## 7 **Contacts**

**SMA Data Protection Office**, Feltrim, Blackrock Road, Cork, T12 N6C8

Phone 021 429 2871.

**Data Protection Commission**, 21 Fitzwilliam Square, Dublin 2, DU2 RD28

Phone 076 110 4800 057 868 4800.

A handwritten signature in blue ink that reads "Malachy Flanagan SMA". The signature is written in a cursive style and is contained within a light blue rectangular box.

**Signature**

**Fr Malachy Flanagan, SMA Provincial Leader**

**Date 30 July 2021**