



CCTV policy

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Next date for review:	September 2025

YWCA Ireland is committed to ensuring the safety and welfare of all employees (which includes temporary staff, interns, volunteers and applicants for employment, as defined in the Employee Data Protection Policy), contractors, occupants, residents and other individuals who visit any of our premises, buildings and Centres (together “**visitors**”) (“**Centres**”). As part of that commitment, we have CCTV cameras at our Centres.

This policy is the first point of reference for all issues regarding the use of CCTV cameras at our Centres. This policy should be read in conjunction with our Employee Data Protection Policy and Data Protection Policy.

Any CCTV must be operated and used in accordance with this policy and the above policies, and any use of CCTV outside of this policy is unauthorised. A breach of this policy by an employee may, in appropriate circumstances, be treated as a disciplinary matter. A breach of this policy may be regarded as misconduct leading to disciplinary action, up to and including dismissal.

The policy covers how to use CCTV cameras fairly; what to take into account when positioning CCTV cameras; and how CCTV images should be accessed, stored, and disclosed. YWCA Ireland is the controller for any personal data generated by the use of CCTV systems.

Following this policy will help ensure that YWCA Ireland complies with relevant data protection laws. The data protection laws apply to the use of CCTV across our Centres. Non-compliance with the data protection laws (for example, through the misuse of CCTV cameras, or the images we capture) can expose YWCA Ireland and its staff to complaints, regulatory action and fines.

For all Centres where CCTV is used, a review of the use of such CCTV will be undertaken by the responsible Centre manager to ensure that the use of such CCTV complies with this policy and that the use of CCTV is still justifiable.

This policy is non-contractual and does not form part of the terms and conditions of any employment or other contract. We may amend this policy at any time.

For employees: If you have any queries about the use of CCTV by YWCA Ireland, please contact the General Secretary (claire@ywca.ie).

For residents and all other visitors to the Centres: If you have any queries about the use of CCTV by YWCA Ireland, please contact the General Secretary (claire@ywca.ie).

In summary:

- YWCA Ireland monitors both the internal and external areas of the Centres using CCTV systems. Images recorded by CCTV systems are considered personal data.
- CCTV may only be used and the recorded images accessed, for a lawful purpose. YWCA Ireland uses CCTV to comply with its legal obligations, to protect the vital

interests of visitors, to comply with its legal obligations in relation to health and safety, and for its legitimate business interests in ensuring the security of Centres, to protect the safety and security of our visitors, to protect our property, to deter crime, to investigate any security incidents or accidents, to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings, and to assist in the defence of any civil litigation, including employment tribunal proceedings.

- Appropriate notices must be clearly displayed at the Centre where CCTV is being used, using the template at Appendix 1 to this policy.
- CCTV cameras must be positioned in an appropriate location which reflects the purpose the CCTV is being used for and must not be positioned in a way which would collect more information than is necessary.
- Recorded images must be routinely, securely destroyed in accordance with the retention periods in this policy. It is not permissible to store images indefinitely.
- CCTV images may only be accessed and viewed by persons with the appropriate authority (please see section 3 below). The accessing of CCTV images without the appropriate authority is a disciplinary matter.

The above rules are now explained in more detail below.

1. Purpose, positioning of cameras, and use of images

In order to record images using CCTV, YWCA Ireland must ensure that the processing of the images is fair and lawful and that there is a lawful purpose for collecting and using the information. Taking this into account, CCTV may be used and accessed at our Centres for the following purposes:

- to detect, prevent and investigate potentially criminal behaviour and protect buildings/premises and assets from damage, disruption, vandalism and other criminal behaviour;
- for the personal safety of visitors and to act as a deterrent against criminal behaviour;
- to support law enforcement bodies in the prevention, detection and prosecution of crime;
- to assist in day-to-day management, including ensuring the health and safety of visitors;
- to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings;

- to exercise, establish or defend legal claims;
- to assist in the defence of any civil litigation, including employment tribunal proceedings; and
- as a deterrent to members of the public considering entering our Centres without permission, and to ensure security at the Centres.

If CCTV is being used at a Centre not for one of the reasons stated above, then the CCTV should be suspended immediately whilst the responsible manager consults with the YWCA Ireland senior management team. Please check that you fall within one of the above categories when installing new CCTV. The positioning, adjustment and re-situating of CCTV cameras must reflect the purposes for the use of CCTV and cameras should be sited to ensure that they do not view areas that are not of interest.

In areas where individuals would have a heightened expectation of privacy (e.g. bathrooms, changing rooms, bedrooms) CCTV should only be used in exceptional circumstances with the prior consent of the YWCA Ireland's General Secretary (see section below concerning covert monitoring).

The images captured must be appropriate for the stipulated purpose in terms of e.g. quality, size, level of detail, light and any obstructions. Date and time stamps should be checked for accuracy.

If CCTV is to be provided by a third party on YWCA Ireland's behalf or in conjunction with a third party, a written contract must be in place to outline the obligations of both parties in respect of such CCTV and to ensure data protection laws are complied with.

2. Transparency

CCTV cameras are located in the following areas:

- YWCA Dublin: CCTV cameras monitor the exterior of the building with a focus on the door bell and main door, the path between the main entrance and the Annex door and the path to the back gate, the garden, the car gates and refuse area, and the following interior sites: the interior of the front door, the Lecture Room, and the Dining Room. This monitoring occurs 24 hours a day and this data is continuously recorded.
- YWCA Monaghan: CCTV cameras monitor the front reception area , above the entrance door to the premises, the hallway and stairs and the rear of the building focussing on the alleyway. This monitoring occurs 24 hours a day and this data is continuously recorded.

Camera locations are chosen to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring. As far as practically possible, CCTV cameras will not focus on private homes, gardens or other areas of private property.

The CCTV system will not be used to record sound.

To ensure that the processing of CCTV images is 'fair' under the data protection laws, appropriate notices must be clearly displayed in an area where CCTV is being used (a CCTV Notice). Example CCTV Notices for use on a Centre are set out in Appendix 1.

For each Centre, the CCTV Notice should: (i) be placed at the entrance to the Centre, and to reinforce the message, further CCTV Notices should also be placed within the Centre; (ii) be clearly visible and readable; (iii) contain details of the organisation operating the CCTV cameras (i.e. YWCA Ireland), the reason for their use, and contact details for any questions in relation to the use of CCTV; and (iv) be an appropriate size, considering the context in which they are used.

Clear, regular and prominent signs are particularly important where the CCTV is discreet, or in locations where people are less likely to expect it e.g. in meeting rooms.

3. Covert Monitoring

YWCA Ireland will never engage in covert monitoring or surveillance (that is, where individuals are unaware that the monitoring or surveillance is taking place) unless, in highly exceptional circumstances, there are reasonable grounds to suspect that criminal activity or extremely serious malpractice is taking place and, after suitable consideration, we reasonably believe there is no less intrusive way to tackle the issue.

In the unlikely event that covert monitoring is considered to be justified, it will only be carried out with the express authorisation of General Secretary. The decision to carry out covert monitoring will be fully documented and will set out how the decision to use covert means was reached and by whom. The risk of intrusion on innocent individuals will always be a primary consideration in reaching any such decision.

Only limited numbers of people will be involved in any covert monitoring.

Covert monitoring will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected illegal or unauthorised activity.

4. Access to, and storage of, CCTV images

Storage

All CCTV records must be retained in a secure place to which access is controlled.

CCTV records may only be accessed by authorised persons and the Centre manager must maintain a log of who has such access and be able to justify why such persons require access. Sufficient controls are in place to prevent any wireless transmission systems from being intercepted or to prevent unauthorised dissemination within YWCA Ireland or to third parties.

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The integrity of the images must also be preserved and the equipment should be checked to ensure this.

CCTV images must only be retained for as long as necessary in accordance with the purpose for which they have been collected. Where images are no longer required, they should be securely destroyed. There should be an auditable trail of the destruction. The law does not set out a mandatory time limit for retention of images, however YWCA Ireland will apply the following retention periods:

- a) Images stored where there are no reported incidents at the Centre: a maximum of 30 days from the date the image was recorded, after which the footage will be deleted; and
- b) Images stored where a matter is under investigation at the Centre: a maximum of six months from the closure of the investigation, unless YWCA Ireland requires the images to be stored for longer for the purpose of legal proceedings, after which the footage will be deleted.

Access rights

Access to CCTV images is strictly limited to those personnel who require access in accordance with the purpose for which the images have been collected (set out on section 1 above). At Centre level, this should be Centre managers/ YWCA senior management only. Such images may also be viewed by others in the event of any investigation. Any images should be viewed in a restricted area to minimise the potential number of people who are able to view the images.

Where access is granted or images are viewed, the following should be clearly documented: (i) the date and time at which access was permitted (or in the case of live streaming, the date and time that live streaming was viewed); (ii) the identification of any individual within YWCA Ireland or third party who was allowed access; (iii) the reasons for permitting access; and (iv) the extent of the images to which accessed.

Any access should only be granted in areas designated for such viewing and to which entry is clearly restricted. Only in very limited circumstances should CCTV footage be removed from the place where it is normally stored on premises of YWCA Ireland (or, where applicable, the operator of the system).

Where footage is removed, the following should be documented by the responsible manager: (i) the date and time of removal; (ii) the name of the person viewing the tapes or images including any third parties; (iii) the reason for removing the images; (iv) the outcome if any of the viewing; and (iv) the date and time that the tapes, disks or other media were returned to the place from which they were removed or, if not returned, whether the tapes, disks or other media were retained for evidential purposes.

Disclosure of CCTV footage to third parties

CCTV images will be disclosed by YWCA Ireland to third parties in certain circumstances where it is clear that the person to whom YWCA Ireland is disclosing the images has the authority to receive them, or where there is satisfactory evidence that the footage is required for detection, investigation or prosecution of a crime, legal proceedings or under a court order that has been produced.

In normal circumstances, these third parties are:

- law enforcement authorities by formal request (data will not normally be released unless there is satisfactory evidence that it is required for legal proceedings or under a court order which has been produced, or otherwise where the images are required for detection, investigation or prosecution of a crime);
- insurance providers; and
- professional advisors (if authorised by YWCA Ireland senior management).

Please contact YWCA Ireland senior management if you receive such a request. CCTV images must not be volunteered or otherwise published or made available (e.g. loaded onto the internet or disclosed to the police or media) without the authority of YWCA Ireland senior management.

We will maintain a record of all disclosures of CCTV footage.

5. Rights of individuals whose image is captured by footage

Individuals, including both YWCA Ireland employees and visitors to Centres, have a number of rights in relation to their CCTV images, including the right to access images, and in certain circumstances, to have the images rectified (if possible), to request that the images are erased, to request the restriction of the processing of the images, and to object to the collection of the images.

Any such requests should be notified to YWCA Ireland senior management immediately upon receipt of such request so that they can assist you in dealing with such a request and so that YWCA Ireland can respond within the statutory time periods it must comply with (typically one calendar month).

In order for YWCA Ireland to locate relevant footage, any requests for copies of recorded CCTV or other surveillance system images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.

YWCA Ireland reserves the right to obscure images of third parties when disclosing surveillance system data as part of a subject access request, where considered necessary to do so.

6. Compliance and contact us

Any breaches of this policy must be notified to General Secretary immediately or in any event within 24 hours.

Compliance with this policy must be regularly checked by Centre Managers and will be subject to audit from time to time.

If any member staff has questions about this policy or any concerns about our use of CCTV systems, then they should speak to their line manager in the first instance. Where this is not appropriate or matters cannot be resolved informally, employees should use our formal grievance procedure.

Individuals whose image is captured by footage have the right to lodge a complaint to the Data Protection Commission (the Irish data protection supervisory authority) if they believe their rights under data protection legislation are not being complied with by YWCA Ireland.

For further information on your rights and how to complain to the Data Protection Commission, please refer to: <https://www.dataprotection.ie/>, or contact the Data Protection Commission using the following details:

Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28
Ireland

Appendix 1

Example CCTV Notice

WARNING: CCTV IS USED AT THIS CENTRE AT ALL TIMES

YWCA Ireland uses CCTV in this Centre for the reasons set out in the CCTV Policy including security, crime prevention, health and safety purposes and grievance and disciplinary purposes. For more information, please refer to the YWCA Ireland CCTV Policy available at [\[insert link\]](#) or contact [\[insert title, email and phone number\]](#).