

CCTV Policy

Ref: IC004, v1

May 2024



**An Bord Um
Chúnamh Dílthiúil**
Legal Aid Board

Providing access to justice since 1979

Policy and Procedure Document Summary

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Document Owner (Director)	Gareth Clifford
Document Author	Dr. Brian Moss
Document Approver (Person or Group)	Executive Management Team
Note: Formal review may occur sooner if new legislative/regulatory or emerging issues/research/technology/audit etc. dictates sooner.	

Version Control				
Version No.	Date Reviewed	Description of Change	Author	Approved by
1	4/3/2024	New Policy, Full Review	Brian Moss	Gareth Clifford



1. Purpose

This policy concerns the use of Closed Circuit Television (CCTV) operated by the Legal Aid Board (the Board, as Data Controller), internally and externally, across its business premises. The policy is intended to notify those visiting Board premises of its CCTV and associated technology use, and the obligations and rights that arise from such use.

2. Scope

This policy relates to the location and use of CCTV, and the recording and subsequent use of such recording material.

3. Target Audience

This policy is intended for Board staff, clients, and service providers to the Board. A copy of this policy is available on the Board website www.legalaidboard.ie.

4. Justification

CCTV systems capture images and may assist identify persons either directly or indirectly through details about them (e.g. clothing) or their presence in / around a Board premise on a particular day at a particular time. The Board's installation, use of CCTV, and any subsequent use of recorded material is for the following purposes only:

- a) To ensure the health and safety of staff and visitors to its premises
- b) To protect its business premises, assets, and information;
- c) To deter and detect disciplinary matters and crime; and
- d) To assist in investigating health and safety incidents.

The above purposes provide the legal basis for the CCTV system, namely for the Board to carry out its tasks in the public interest.

Use of any recorded material will adhere to GDPR and the Data Protection Acts 1988 to 2018.

5. Roles and Responsibilities

Staff of the Legal Aid Board: all are individually responsible for reading, understanding, and complying with obligations of the GDPR, the Data Protection Act 2018, set out in this policy, and in all Board data policies in their daily work. All policies are available on www.legalaidboard.ie. Staff are also individually responsible for engaging with data protection training provided by the Board.

Data Protection section: advises on and monitors compliance with data protection legislation, taking timely action and making recommendations to improve the Board's performance where needed. The section should be consulted



for guidance on this policy by a local business unit manager where necessary. The section acts as the main contact point for the Data Protection Commission, the Irish supervisory authority on data protection on all matters relating to this policy.

6. CCTV Operation

The Board's CCTV System is maintained by the Board and / or contractors. Access to the CCTV footage is protected by password to authorised personnel only. All data are stored in a secure location with access limited to designated staff members. This limits unauthorised access, unlawful processing, accidental loss, destruction, or damage.

Cameras operate on a 24/7 basis, recording only the areas intended to be covered by the equipment.

7. Location

The Board maintains CCTV cameras across its business premises, monitoring internal general access and external public areas of immediate relevance to the Board.

8. Signage

All Board locations operating CCTV indicate their use of such recording activity. The Board does this using signage in prominent locations across its business premises. These include car parks and the entrance/ reception areas of its business premises.

The signage sets out:

- That the Board is using CCTV; and
- Contact details for the Board.

9. Storage & Retention

CCTV footage captured by the Board is retained for 30 calendar days. Recordings of specific incidents will only be retained for longer if necessary for the period involving the investigation and finalisation of health, disciplinary, or safety matters.

10. Disclosure of Data

Data captured by the Board's CCTV system may be requested by law enforcement and others carrying out investigations (e.g. health and safety, insurance). Except in the case of warrant or court order, the Board is not legally required to grant such requests and will decide each case on its merits.



Internal requests for obtaining and using CCTV footage must be approved by the Board's Human Resources Unit. Please see third-party data request policy.

11. Access

A person may request CCTV footage of themselves from the Board. To do this they should make a subject access request to the Data Protection section at dataprotection@legalaidboard.ie, specifying the date, time, location of the possible CCTV recording and anything that will assist identify them (not other persons).

In each request the following information will be sought and kept by the Board:

- Reason for the request
- Image disclosed (date, time, and location)
- Whether the image was disguised to prevent identification of others.

The Board will decide each request on a case-by-case basis. This will include consideration of the footage itself and the rights of third parties evident in the footage. The Board DPO will communicate a decision to grant / refuse access to the CCTV data sought to each requester.

Where the Board agrees to release the CCTV imaging, but it is not possible to provide the video footage, the Board will arrange for stills to be provided for each second of footage in which the data subject appears.

As all CCTV footage is deleted 30 days from its creation, a request for CCTV footage should be received by the Board within 30 days of the event's occurrence. This will enable the Board to respond to the access request and set aside any footage as necessary until reasonable efforts have been made to satisfy the subject access request.

The Board will log all access to CCTV footage.

12. Contact Details

The Board's Data Protection section and Data Protection Officer can be contacted at the details below. These are also published on the Board's website www.legalaidboard.ie

Data Protection Officer
Legal Aid Board
Quay Street,
Cahirciveen
Co. Kerry
V23 RD36

Phone: (066) 947 1000

Email: dataprotection@legalaidboard.ie



13. Making a Complaint

A person dissatisfied with the Board's response to matters relating to its CCTV policy may then submit a complaint as follows:

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

Phone: (01) 765 0100

Email: info@dataprotection.ie

Web: www.dataprotection.ie

14. Monitoring, Enforcement, and Alteration

Compliance with this policy will be monitored by the Data Protection section and the EMT members reporting to the Board Audit and Risk Committee.

The Board reserves the right to take action it deems appropriate where individuals breach this policy. Board staff who breach this policy may be subject to disciplinary action. The Board reserves the right to remedy a breach of this policy by contractors, sub-contractors and commercial service providers via contracts in existence with them.

The Board will amend this policy regularly but may amend this policy at any time to take account of business, legislative, or organisational changes.

Any changes to the policy will be notified on the Board website.

