



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive



National Ambulance Service (NAS)
Policy for Use of CCTV Systems
(All Divisions)

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1. Policy Statement

- Closed Circuit Televisions (CCTV) is an increasing feature of our everyday lives. It can, and is, used for a variety of reasons and has been regulated in accordance with the Data Protection Act 1988 and 2003.
- This policy is designed to inform staff and the public about the safeguards in place with regard to the operation of and access to the CCTV systems and the resultant images.

2. Purpose

- The CCTV systems within the National Ambulance Service (NAS) will monitor the interior/exterior of vehicles, car parks, reception areas and specific office locations.
- Area covered by surveillance cameras will be those most susceptible to unauthorised activities. The cameras are there for the deference of crime against an individual's safety, individuals and NAS property when on NAS vehicles and premises.
- CCTV in itself does not offer protection but rather deterrence.

3. Scope

- This Policy applies to all NAS staff, vehicles and premises.

4. Legislation/Other Related Policies

- A. Data Protection Act 1988 and 2003
- B. HSE Data Protection and Freedom of Information Policies

5. Glossary of Terms and Definitions

CCTV Closed circuit Television
EEA European Economic Area

6. Roles and Responsibilities

- It is the responsibility of the most senior officer to monitor this policy and ensure it is implemented in their relevant areas.
- Two designated officers in each area will be the co-responsible persons for the management of CCTV equipment and the availability of recordings/images. One officer cannot release/access data without the expressed agreement of the other.
- All employees must adhere to the relevant parts of this policy.
- Subject access requests for access to recordings/images will be dealt with by the designated officers who will be responsible for the copying of or on site viewing of the recording. Details of the request, the decision taken and subsequent viewing or copy released, should be passed to the relevant Data Protection and Freedom of Information Officer.
- The designated officer's i.e. Data Protection Decision Maker will ensure that no third party information or data is released, except with the authority/consent of that individual.

7. Data Protection Compliance

Data Protection Principles

- In order to comply with the Data Protection Act 1988 and 2003, all of the following principles must be met:
 - A. Be processed fairly and lawfully
 - B. Be processed for specific purpose and not for any that may be considered incompatible with these.
 - C. Be adequate, relevant and not excessive
 - D. Be accurate and up to date
 - E. Not kept for longer than is necessary for the purpose.
 - F. Be processed in accordance with the right of the individual
 - G. Be protected in accordance with the rights of the individual
 - H. Be protected against unlawful or unauthorised processing.
 - I. Not be transferred to countries outside the EEA without adequate protection.

8. Siting of Cameras and Signage

Siting

- It is essential that the surveillance equipment is sited in such a way that it only monitors those areas intended to be covered by the equipment.
- If it is not possible to restrict coverage, the owner of the property or space being overlooked should be consulted. If cameras are adjustable by the operators, this should be restricted so that it is not possible to manipulate them to overlook areas not intended to be covered. Operators should be trained in recognising privacy implications.
- Signage
- It is essential that legible "CCTV RECORDING IN USE" signs are displayed in a prominent place where they will be clearly seen by both staff and the public. The signs should contain the following information:
 - A. Identity of the organisation responsible for the surveillance.
 - B. Purpose for the surveillance
 - C. Contact details
 - D. Image of a camera

9. Quality of the Images

- It is important that images are not retained for longer than is considered necessary for the purpose for which they were processed. While images are retained, it is essential that their integrity is maintained, for both evidential purposes and to protect the rights of those individuals captured in the images.
- Images should not be retained for longer than 40 days unless they are required for evidential purposes in legal proceedings. Under these circumstances, the information should be retained securely and clearly marked as to why it is being retained for a period exceeding 40 days.

10. Retaining Information and Processing Images

- It is important that images are not retained for longer than is considered necessary for the purpose for which they were processed. While images are retained, it is essential that their integrity is maintained, for both evidential purposes and to protect the rights of those individuals captured in the images.
- Images should not be retained for longer than 40 days unless they are required for evidential purposes in legal proceedings. Under these circumstances, the information should be retained securely and clearly marked as to why it is being retained for a period exceeding 40 days.

11. Access to the Images

- It is important that access to, and the disclosure of, the images to third parties is strictly controlled and documented. This is to ensure that the rights of the individual are maintained and that the chain of evidence remains intact should the images be required for evidential purposes. The designated Access Officers/Decision Makers will be appropriately trained to manage Freedom of Information and Data Protection access requests.
- Subject Access Requests
- Under data Protection legislation, an individual has the right to view any personal information held about them by an organisation. All requests should be handled in accordance with the HSE Data Protection and FOI Policy.
- In addition the following should be logged:
 - A. Details of the image disclosed .i.e. the date, time and location of the image and the reason for the disclosure.
 - B. Who was present when the images were disclosed by the decision of the designated Officers/Decision Makers (this should be kept to a minimum necessary).
 - C. Whether any images were disguised/blurred to prevent identification of individuals other than the data subject.
- If it is not possible to disguise images, an external company may be called in to facilitate this. This will need to be logged.
- Requests will not be compiled with if insufficient details are supplied relating to the date and time of recording. A letter must be sent to the requester advising them of this.
- If the data subject wishes to view the images on site, as opposed to a copy being sent, the viewing should take place in a closed office with only the relevant individuals present.

Garda Requests

- In line with Section 8 of the Data Protection Act 1988 and 2003, An Garda Síochána are entitled to view personal information about individuals if it is for the following purpose:
 - A. For the prevention or detection of crime
 - B. The apprehension or prosecution of offenders
 - C. Required urgently to prevent injury or other damage to the health of a person or serious loss of or damage to property.
 - D. Required by or under any enactment or by a rule of law or order of a court.
 - E. Requests must be made on the official Garda Data Protection form and passed to the designated Officers.
- Actions will be logged as per the subject access guidance on section 11.1. Should information be required to be retained for evidential purposes, procedures detailed in section 10.0 should be followed.

12. Implementation Plan

- This Policy will be circulated electronically to all Officers, all Supervisors and Staff.
- This Policy will be placed in hardcopy in each Division's Policy manual in each Ambulance Station and Ambulance Control Centres for ease of retrieval and reference.
- Each CAO will ensure that the Officer responsible for updating Policy manuals will return the confirmation form to NAS HQ to confirm document circulation to all staff.

13. Revision and Audit

- This policy will be formally reviewed every three years or earlier when necessary following changes in procedures and/or legislation or a relevant event.
- The Senior Ambulance Management Team has the responsibility for ensuring the regular review and updating of this policy.
- Revisions amendments or alterations to the policy can only be implemented after consideration and approval by the Director of NAS, following appropriate consultation and review by the Corporate Data Protection and Freedom of Information office.
- The senior Ambulance Management Team will monitor Divisional and National compliance with this policy on an ongoing basis.
- The National Ambulance Service will seek advice on service compliance issues at least annually with a view to recommending corrective action or amendments where appropriate.
- Each request to access personal data will be managed in accordance with this policy and any procedures or guidelines that may follow.
- Each access request and resulting decision taken by the designated officer/decision maker will get notified directly to the FOI & DP office in this HSE area.

14. Revision History: (This captures any changes that are made to a SOP when it has been revised. This may be placed at the back or close to the front of the document according to local preference.)

No	Revision No	Date	Section Amended	Approved by
1	3	01/01/2017	No amendments needed	Pat Grant

15. References

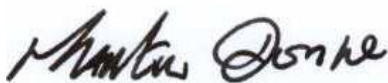
- Legal Opinion - -CCTV in ambulances – Thomas A. Walsh and Company 17th May 2006

16. Appendices

- Appendix I – Policy Acknowledgement Forms

17. Signatures of Approval

All persons must sign and date this page after they have read and understood the Standard Operation Procedure/Policy.



 National Ambulance Service Director
 On Behalf of the National Ambulance Service

Date **3rd January 2017**

Document Control No. 1 (to be attached to Master Copy)

NASPO39 NAS Policy for the Use of CCTV Systems

Reviewer: The purpose of this statement is to ensure that a Policy, Procedure, Protocol or Guideline (PPPG) proposed for implementation in the HSE is circulated to a peer reviewer (internal or external), in advance of approval of the PPPG. You are asked to sign this form to confirm to the committee developing this Policy or Procedure or Protocol or Guideline that you have reviewed and agreed the content and recommend the approval of the following Policy, Procedure, Protocol or Guideline:

Title of Policy, Procedure, Protocol or Guideline:

NASPO39 NAS Policy for the Use of CCTV Systems

I acknowledge the following:

- I have been provided with a copy of the Policy, Procedure, Protocol or Guideline described above.
- I have read Policy, Procedure, Protocol or Guideline document.
- I agree with the Policy, Procedure, Protocol or Guideline and recommend its approval by the committee developing the PPPG.

Name

Signature (Block Capitals)

Date

Please return this completed form to:

Name: Niamh Murphy
Contact Details: Corporate Office
National Ambulance Service
Rivers Building
Tallaght Cross
Dublin 24
email niamhf.murphy1@hse.ie

Key Stakeholders Review of Policy, Procedure, Protocol or Guidance Reviewer Statement

Reviewer: The purpose of this statement is to ensure that a Policy, Procedure, Protocol or Guideline (PPPG) proposed for implementation in the HSE is circulated to Managers of Employees who have a stake in the PPPG, in advance of approval of the PPPG. You are asked to sign this form to confirm to the committee developing this Policy or Procedure or Protocol or Guideline that you have seen and agree to the following Policy, Procedure, Protocol or Guideline:

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