

Augustinian Province of Ireland

IT Policy

Electronic Data Management
Website
Social Media
CCTV
Live Streaming.

POLICY
January 2025



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Forward:

The Augustinian Province of Ireland has an ethical responsibility to maintain the highest standards of confidentiality in the safeguarding of information about its members, staff members and those individuals, donors, agencies and others that interact with the Province.

Information collection is essential to us fulfilling our duties. Data Protection legislation seeks to give people control of their own personal information and so it confers certain obligations on the Province in relation to how personal information is collected and used. The legislation was originally introduced to protect individual's personal information from misuse by automated means. This has since been extended to include processing of manual data.

The Data Protection Acts of 1988 and 2003 and the General Data Protection Regulations (GDPR) 2018, play a significant role in how we process Personal Data. The aim of this policy is to ensure that each member, staff member and others with whom the Province interacts, has an understanding of the concepts of Data Protection with regard to IT, Website, Social Media, CCTV and Live Streaming, and is aware of their own responsibilities in relation to the Order's overall compliance with the Acts.

Tony Egan OSA
Prior Provincial

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The Augustinian Province of Ireland is a registered charity (CHY7182 CRN 20014926) with its Charity Registered Office at Taylor's Lane, Ballyboden, Dublin 16.

This policy has been developed to demonstrate our commitment to protecting and respecting your personal data. We use a range of communication services to send information to our members, donors, volunteers and the general public for the purposes of providing up to date information on mass times, events, news, evangelization and more.

The Augustinian Province of Ireland fully complies with Irish Data Protection Legislation and the Data Protection principles set out in GDPR legislation introduced on 25th May 2018. This Policy applies to personal data collected, processed and stored electronically by the Province in relation to members, staff members, service providers, donors and those individuals, agencies and others with whom we interact in the course of our activities.

This document also outlines how we protect your personal data through the use of up to date technological systems, GDPR Awareness Training for staff and members of the order, regular Data Protection Impact Assessments and technical expert advice from third parties.

The Augustinian Order in Ireland provides a Chaplaincy service to two schools in New Ross and Dungarvan, both of which are run by Boards of Management. Whenever third parties use Augustinian premises for events in which children attend and participate, safeguarding guidelines for such events can be found on our website, www.augustinians.ie/safeguarding.

Electronic Data Management:

In the course of its daily organizational activities, the Augustinian Province of Ireland acquires, processes and stores Personal Data in relation to:

- Friar members of the Order
- Employees of the Province
- Third party service providers engaged by The Province
- Donors
- Volunteers

In accordance with Irish Data Protection legislation and the GDPR, this data must be managed fairly and securely. Processing of personal data is carried out only as part of Augustinian Province of Ireland's lawful activities, and the Province safeguards the rights and freedoms of the Data Subject. The Data Subject's data will not be disclosed to a third party other than to a party contracted to the Augustinian Province of Ireland and operating on its behalf.

The Augustinian Province of Ireland employs high standards of security in order to protect the personal data under its care. Appropriate security measures are taken to protect against unauthorized access to, or alteration, destruction or disclosure of any personal data either manual or electronic held by The Province in its capacity as Data Controller. Access to and management of personal data is limited to those who have appropriate authorization and password access. Administration staff are asked to keep emails and computer files password protected and to limit access.

Since 25th May 2018, the Provincial of the Province, his Council and staff have undergone GDPR Awareness training and use laptops especially for work purposes that are encrypted in case of theft or damage, are password protected in order to limit access and are monitored by a reputable IT company. GDK Network Systems provides the Province with helpdesk support, remote monitoring and management, and anti-virus software. The Province has in place a Data Processing Agreement with this company and further details of how they manage data can be found on their Privacy Notice, www.gdk.ie/gdpr.

Website:

The Augustinian website, www.augustinians.ie uses Google Analytics, a web analytics service provided by Google. Google Analytics uses "Cookies" which are files placed on your computer to help the website analyse how users use the site. The information generated by the cookie about your use of the site (including your IP address) will be transmitted to and stored by Google on

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servers in the United States. The cookies allow us to understand general traffic to our website, number of visits, time on site and helps us make improvements and develop the website to enhance the user experience. For further information please see Google's Privacy Policy www.google.com/policies/privacy (<https://www.google.com/policies/privacy>).

By using our website, you consent to the processing of data about you by Google in the manner and for the purpose set out above.

The Augustinian website, www.augustinians.ie also uses Jetpack, a tool that supports Wordpress designed websites by monitoring traffic to the site and security. The Jetpack application is defined as a third-party when it comes to cookies. In other words, we do not collect and store personal information, but Jetpack, themselves may, in order to enhance the visitor experience to our website. Also, some of Jetpack's features may themselves use third-party applications and services, and again, these are used in order to enhance the visitor experience to our website. We have no control over or access to the information or tracking details collected by any third-party cookies. Therefore, if you require more information, we recommend consulting the privacy policy of Jetpack. <https://jetpack.com/support/privacy/>.

The Augustinian website, also uses Yoast SEO, a tool that supports Wordpress designed websites by monitoring traffic to our website. The Yoast SEO plugin is there to aid with SEO (Search Engine Optimisation) standards. As a general rule, Yoast do not seek personal data of customers' or visitors' to our website. Therefore, their role relates to website data, and not personal data as such. More details on Yoast SEO GDPR policy can be found at: <https://yoast.com/help/gdpr/>.

Images on our Website/Facebook Page:

Images from any events may be displayed on either our website or social media site and in that case the Augustinian Province of Ireland will ensure that...

- The content of photographs and film material is appropriate
- The consent of parents or guardians and of children to use an image is obtained and such consent recorded.
- Children cannot be identified in photographs and other images likely to be published in print media or on the Internet.
- Parents/guardians and children are aware of the way the image will be used to represent the Order.

Please Note: Minors have no access to Augustinian computers.

For more information on safeguarding please visit, www.augustinians.ie/safeguarding

"Safety Lock" will be placed on all Augustinian Websites to prevent cut & paste of photographs in Gallery section.

Website Security:

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The Augustinian Province of Ireland takes its security responsibilities seriously by employing the most appropriate physical and technical measures including staff training and awareness. To ensure the security of your credit card information we use STRIPE, a technology company that uses e-commerce software to accept and manage payments online. When you donate or make a purchase through our website/online shop, debit/credit card information is not retained on our site but is securely transferred to STRIPE who collect payment method information such as credit/debit card number and bank account information, purchase amount, date of purchase and payment method. They may also collect your name, email, billing or shipping address and in some cases your transaction history in order to authenticate you. For further information on STRIPE and how they manage your data please see www.stripe.com/ie/privacy.

When donating or making a purchase via our website www.augustinians.ie we would like your permission to retain your email address so we can notify you of upcoming events or promotions. The Augustinians will never contact you without your consent and will not share your information with any third parties.

Facebook/Twitter/Instagram:

The social media world changes by the minute; new tools and applications are introduced to social network users virtually every day. Therefore, our policy will evolve on a regular basis to keep pace with the changing social environment. We advise you to check our website regularly for updates.

Facebook collects information about people, accounts and groups you are connected to. They also collect contact information (if you choose to upload or import from a device such as an address book or call log) which they use for connecting you to others and help find people you may know. They also collect information on the types of content you view or engage with as well as information about financial transactions made on their products. Facebook also receive and analyze content, communications and information that other people provide about you. For more information on Facebook's Data Policy, please visit, www.facebook.com/policy.php.

NB: The Augustinian Province of Ireland does not collect any information about visitors to our Facebook page.

The Augustinian Province of Ireland Social Media site (Facebook) is coordinated through our Communications Office. The OSA post a wide range of information on Augustinian events from around the country and abroad. The Augustinian Province of Ireland retain images for 90 days after which time they are permanently deleted. The Augustinian Province of Ireland will only retain images that are of historic value or are news-worthy to the Order.

Some Augustinian events may be attended by an official Photographer appointed by the Order. Where filming or photography is taking place, advance warning will be given on all promotional material and Augustinian internet sites in the run up to the event and an announcement will be made at the start, allowing attendees the opportunity to inform the photographer if they do not wish to be filmed/photographed. Notices will also be displayed at all events stating filming/photography is taking place. (Please see sample in appendix)

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The Augustinian Province of Ireland will not tolerate any of the following on their social media pages and action will be taken if found to be in breach:

- The Posting of Defamatory material
- Material infringing OSA copyright or intellectual property rights
- Material in breach of OSA privacy or confidentiality obligations
- Offensive, obscene or sexually violative material
- Threatening, abusive or insulting statements likely to stir up hatred
- Communication with anyone underage
- Cyber bullying, emotional abuse and sexual abuse

Postings in the nature of any of the above will be removed immediately and the poster blocked and reported to the relevant authorities.

The Augustinian Province of Ireland is not responsible for individuals who attend Augustinian events and upload related images or comments to their own social media sites.

The Augustinians will officially appoint a person to film/photograph at Augustinian events.

CCTV:

The Augustinian Province of Ireland as a Data Controller processes the personal data of individuals through its use of Closed Circuit Television (CCTV) at its premises throughout the province. All recorded material is the property of the Augustinians. This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material.

The Augustinian Province of Ireland use CCTV for the following purposes...

- Security – to assist in providing for the security of members of the faithful, friars, staff, volunteers and visitors; to periodically monitor and protect Augustinian buildings and facilities; to assist in the prevention and detection of crime and prosecution of offenders.
- Risk Management – to assist in providing for the safety of members of the faithful, friars, staff, volunteers and visitors; to assist in the resolution of incidents involving workplace hazards, injuries or near misses; to assist in the processing of allegations/claims against the Augustinian Province of Ireland.
- To assist the Augustinian Province of Ireland where its grievance, disciplinary or dignity at work procedures have been invoked. CCTV surveillance will not be used to monitor individuals but may be used to gather evidence where procedures are invoked.
- To enable the Augustinian Province of Ireland to respond to legitimate requests from third parties for CCTV footage of incidents e.g., for legal proceedings or insurance investigations.

Where, in the carrying out of these purposes, images are obtained of persons committing acts of an illegal nature and/or acts which breach Augustinian rules and regulations, these may be used as evidence.

The appointed Augustinian Data Processor for the maintenance and management of CCTV will carry out periodic spot checks and maintain a log of all checks and incidents.

While every effort has been made in the layout of the CCTV system to give it maximum effectiveness, it is not possible to guarantee that it will detect every incident that takes place on its premises.

Lawful Basis:

The lawful basis permitting the processing of images of individuals for the above purposes is Article 6 (1)(f) of the GDPR, i.e., the processing is necessary for the legitimate interests pursued by the Augustinian Province of Ireland and its users.

To prevent unlawful access, cameras are situated at entrances such as doors and gates. Where applicable cameras are focused directly on the access points. For Security reasons cameras are situated in the Church near money collection points and in Church shops and Mass offices. These cameras also alert Augustinian personnel in the event of an accident such as a fall or if someone is taken ill. Where possible, footage will be monitored to ensure that all friars, staff, volunteers, other, adhere to relevant health and safety regulations. Footage of findings in breach of health and safety regulation will be used in disciplinary investigations. In all areas, notices are clearly displayed stating that CCTV is in operation.

The technical specifications of the cameras are as per the Garda Guidelines on CCTV – www.garda.ie/cctv

Only Augustinian authorized personnel have access to CCTV systems as well as the security service providers who installed and maintain the system (Data Processors). The Augustinian Province of Ireland has a Data Processing Agreement with the above which is reviewed on an annual basis. Retention of recordings in line with GDPR is set at 28 days and information is stored on a password protected hard-drive and on password protected cloud storage software. When used in conjunction with an investigation or as evidence, recordings may be retained by request specifically in that context until the issue is resolved. After this period, images are safely deleted. A review of cameras surveillance capabilities and locations is conducted every six months.

Third Party Access:

Access to recordings may be viewed by An Garda Siochana for the purposes of preventing or investigating a crime and recordings can be taken away on receipt of a formal written request from a Garda Superintendent. Recordings are securely deleted at the conclusion of the investigation.

Disclosure of information to other third parties is made in strict accordance with the purposes of the system as outlined in this policy. Requests must be made in writing to the Provincial Office. A decision to refuse such a request may be appealed to the Provincial of the Order.

CCTV DO's

- Only use CCTV systems for the purposes of security and health and safety.

- Note the legal basis for using CCTV Systems: *The legitimate interests of the Augustinian Province of Ireland to protect themselves and their property, the Safety, Health and Welfare at Work Act 2005 and Section 3 of the Occupier's Liability Act, 1995.*
- Erect at least two clearly visible CCTV warning signs at every entrance.
- Make the warning signs readable to people before they enter camera shot.
- Ensure that CCTV warning signs state that CCTV is in operation, the purposes for which it is used and the Provincial Office contact details (info@augustinians.ie) in case there is a query or Data Subject Access Request.
- Use coloured warning signs with yellow in the background. (see appendix)
- Hold hardcopies of this policy in reception areas to give to Data Subjects on request.
- Allow Gardaí investigating a crime to review CCTV footage on-site to see if it is of use.
- Get a formal written request, signed by a superintendent, if Gardaí wish to take a copy of CCTV footage off the premises.
- Keep a log of these Garda requests and a copy of each formal request (Appendix)
- Always balance the risk of security or personal safety against the risk of intrusion into the privacy of individuals.
- Locate cameras so as to avoid monitoring of passers-by or private property.
- Fulfil Data Subject Access Requests within 30 days. No fee is payable. (see appendix)
- Retain CCTV images for a maximum of 28 days, 65 days for personal injury claims or for the duration of any legal claims made against the Augustinian Province of Ireland.
- Restrict CCTV access to authorized personnel only.
- Log all access to CCTV, including by Gardaí.
- Keep CCTV storage devices and media in a secure location.
- Backup CCTV systems, where possible.
- Be able to prove that processing of CCTV images complies with the GDPR
- Establish and maintain a record of all CCTV related processing activities.
- Report breaches of identifiable CCTV images to Augustinian Provincial Office.
- Allow Data Subjects to fully exercise all their rights under the GDPR within 30 days and free of charge.
- Build Data Protection principles into new CCTV installations at the design stage.
- Have binding legal contracts with all Processors conforming with Article 28 GDPR.

CCTV DO NOTS

- Locate CCTV warning signs on cameras, camera poles, beside cameras or anywhere that a person enters camera shot **BEFORE** they can read the sign.
- Use monochrome signs, or signs with a grey background, as they are unfair.
- Allow Gardaí to remove CCTV footage without a formal written request from a Superintendent.
- Continuously monitor friars, visitors, volunteers or staff at their work.
- Monitor areas where individuals have a reasonable expectation of privacy such as toilet areas, showers, changing rooms, locker rooms or rest rooms.
- Record passers-by on the street or monitor the private property of others.

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- Use CCTV systems to record audio.
- Use Augustinian CCTV systems for covert surveillance under any circumstances.
- Show or give anyone CCTV footage with identifiable images of other Data Subjects or that allows them to be indirectly identified (e.g., from vehicles)
- Allow processors to process CCTV images except on documented instructions.
- Allow processors to engage a sub-processor without prior authorization.

Streaming:

The Augustinian Province of Ireland uses a third-party streaming service, Church Services TV (CSTV), to provide live-streaming with the purpose of connecting and building communities around the world. Live-streaming allows people who are homebound, in hospital, nursing homes or living abroad to watch live masses, other celebrations or services and, thereby allow parishioners to stay connected.

Live-streaming does not capture and hold images except when the Parish requires a recording. There is no cost to a viewer to attend an on-line service. Through this service daily church ceremonies and family events such as baptisms, communions, weddings, funerals, concerts or other activities inside the church can be live streamed, recorded, downloaded. Authorized personnel only, are able to turn on or off the system, set up schedules and recordings and track viewer statistics. (see www.churchservices.tv/privacy-policy/ for more information).

The Augustinian Province of Ireland has entered into a Data Processing Contract with CSTV in order to comply with GDPR regulations as of May 2018. This contract specifically addresses our Streaming arrangements with CSTV. As highlighted by the Data Protection Commissioner *the GDPR emphasizes transparency, security and accountability by data controllers and processors, while at the same time standardizing and strengthening the right of European citizens to data privacy.*

- Live streaming does not capture and hold images except when the parish requires a recording
- The CSTV system is managed by the Augustinian Communications Office.
- Occasionally the OSA may want to record Church events for historical or important purposes and these will be retained on a permanent basis for our archive. Other recordings will be retained for a maximum of 90 days.
- The camera and related equipment on the Church premises is owned by the OSA. It was supplied for the purposes of live streaming, including the audio connection with the Church's amplification system. All recordings are owned by the OSA.
- CSTV use and store securely visitor's IP addresses to generate viewing statistics such as the total numbers of visitors by country and the time they spent visiting the site. (Cookies)
- OSA Churches will publish upcoming recordings in their newsletters, bulletins, websites, notice boards, social media or other communication channels to allow parishioners or visitors know in advance about recordings. Eg., "The following masses/services will be recorded and they can be viewed online on www.augustinians.ie for 90 days following the ceremony. After that time the recordings will be destroyed, however, exceptions may apply

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where there is a legitimate request or the recording is of an historical or important nature for our archive.

- Funeral recordings will be advertised on our website www.augustinians.ie and the local website.
- Celebrants of services will announce on the microphone to the congregation and visitors that live-streaming and recordings are taking place by welcoming viewers joining the service via the internet at the beginning of the mass or service and so the congregation hears the message.
- OSA will ask for written consent from regular volunteers or the parents/guardians of minors helping at the church whose images may appear on livestreamed ceremonies or recordings.
- Notifications will be placed on or near pews that are in the line of the camera where people can be seen on live streaming and recordings.

Appendix:

Appendix I - Fair Processing Notice (CCTV)

Appendix II – Porch Notices (Streaming)

Appendix III – Notice of Filming/Photography

Appendix IV – Volunteer Consent Forms Adult/Child (Streaming)

Appendix V - Access to and Disclosure of CCTV Images to Third Parties

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**Please contact
info@augustinians.ie
To Report Any Concerns**

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LIVE STREAMING OF SERVICES IN THIS CHURCH

**Please Contact info@augustinians.ie
To Report Any Concerns**

Appendix III

Appendix V

The following details should be documented, on the removal of the media storage device on which the CCTV images have been recorded:

| | |
|--|--|
| Date and Time of Removal: | |
| Any crime incident number: | |
| Location of the Media Storage Device: | |
| Reason for the removal from the system: | |
| Signature (of collecting officer/Superintendent) | |
| Date of Signing | |

The following details should be recorded when a media storage device on which media is stored is removed for viewing purposes:

| | |
|--|--|
| Date and Time of Removal: | |
| Name of the person removing the media storage device | |
| Name(s) of the Person(s) viewing the images | |
| Reason for the removal and reviewing from the system: | |
| The outcome, if any, of the viewing | |
| Date and Time Media Storage was returned or secured if retained for evidential purposes. | |
| Signature (of collecting officer/Superintendent) | |
| Date of Signing | |

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If access to or disclosure of the images is allowed, then the following should be documented:

| | |
|---|--|
| Date and Time of Access Allowed: | |
| Date and Time Disclosure was made: | |
| Name of the person who was allowed access | |
| Name of the person who made disclosure | |
| Extent of the information to which access was allowed or which was disclosed | |
| Name(s) of the Person(s) the identity of the Data Controller authorising such access. | |
| Signature of Person(s) involved: | |
| Date | |

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