

## 1.0 Policy Statement

It is the policy of The Children's Sunshine Home operating as LauraLynn, Ireland Children's Hospice (the Service), to provide a safe environment for all staff, visitors, volunteers and children and adults through the use of door access controls, mobile security patrols, overt cameras and other security arrangements.

The use of Closed-Circuit Television (CCTV) in the Service is part of the operational system for security. The purpose of the scheme is to prevent crime and promote staff security and public safety. The Service ensures that its use of CCTV is carefully governed and is in line with the General Data Protection Regulation, Data Protection and other relevant legislation.

## 2.0 Lawful Basis

The lawful basis by which LauraLynn processes images of individuals for the purposes outlined in our policy statement above is – Legitimate Interest, Article 6(1)(f) of the GDPR i.e., the processing is necessary for the legitimate interests pursued by the Service as outlined.

## 3.0 Scope

3.1 This policy applies to all staff, visitors, volunteers, contractors, children and adults in the Service to inform them of the safeguards in place in relation to all security measures onsite in LauraLynn and in relation to the operation of and access to the CCTV system and the recorded images.

3.2 The CCTV system is operated on premises or areas of premises controlled by the Service to monitor and ensure the safety and security of the Service's employees, property, clients, buildings, information located or stored on the premises, and assets, and those of service providers, consultants, and advisors that assist the Service in carrying out its functions.

The data obtained by the CCTV system may be used to investigate potential security incidents where such are suspected, and to secure evidence, should such incidents occur.

The data obtained by CCTV may also be used for the verification of disputed or unclear events.

Though not subject to constant monitoring, data obtained by CCTV will be accessed as part of occasional audits for the purpose of maintaining security and enforcing the Service's policies.

The CCTV system is not used for any other purpose than that outlined in this policy.

## 4.0 Responsibilities

4.1 *The Chief Executive Officer (CEO):* has overall responsibility for safety on site and ensuring all staff adhere to the policy.

4.2 *The Head of Operations (HOO):* has overall responsibility for the Security in LauraLynn.

4.3 *Quality, Risk and Safety Manager (QRSM):* has responsibility to investigate safety and security incidents and handles all Data Subject and Third Party Information Requests.

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- 4.4 *The Operations Manager:* has the responsibility for the day-to-day management, operation and maintenance of the Security Process and CCTV system.
- 4.5 *Security Administrators:* The Operations Manager and ICT Coordinator are the designated Security Administrators. They have responsibility for the access control to the CCTV network video recorder (NVR) and processes Third Party and Data Subject Access requests.
- 4.6 *Line Managers:* Have the responsibility to ensure their staff are aware of this policy
- 4.7 *Staff:* Have a responsibility to adhere to this policy.

## **5.0 Onsite Security Arrangements**

### **5.1 Front Gate Operations**

- 5.1.1 The main entrance to the Service's site is through an automated gate scheduled to open at 06.30a.m. every morning and to close at 10.00p.m. every evening. Between 06.30a.m. and 10.00p.m. the gates are held open to allow access to all service users, staff and visitors. Outside of these times the gates are closed with access still available to enter the site through swipe/fob or by intercom to Hazel House and LauraLynn House. Service users can leave the site out of hours by driving up to the gate to activate a pressure sensor.
- 5.1.2 The gates are maintained annually and any fault/problem is to be reported promptly to Facilities through the ticket log system. The gate can be manually opened at any time through a lever stored in Hazel House and Facilities' key boxes.

**N.B.** Time clocks are changed by service provider within a month of daylight-savings.

### **5.2 Access Control**

- 5.2.1 LauraLynn's access control system is a managed clocking and access system maintained by an external contractor (Softworks). The system is designed with fob points located throughout the site to ensure only visitors permitted to areas are cleared to enter adding an additional layer of safety and security to the site.
- 5.2.2 Access badges are issued to staff/volunteers with various levels of access clearance as appropriately identified by the HR Department. Contractors are issued access badges where appropriate by the Facilities Department and Main Reception.

### **5.3 Intruder Alarm System**

- 5.3.1 LauraLynn House and Rowan House are fitted with Intruder alarms. Rowan House is protected out of office hours by a monitored intruder alarm system. The code of the alarm is activated and deactivated by specific key holders to the Rowan House offices.

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- 5.3.2 The alarm system is operated by a touchscreen in the main reception area and is a mixture of wireless internal motion sensors and contact sensors (door & window).
- 5.3.3 If the alarm is activated out of hours, Action 24 and/or staff will contact the mobile patrol security company to investigate. See Appendix 2 - Security Process LauraLynn.

**5.4 Mobile Patrol Security**

- 5.4.1 Twice daily (between 9pm and 6am) the site is patrolled by Synergy Security.
- 5.4.2 The mobile patrol security guard walks the perimeter of the site and has logs of their patrol at 4 separate NFC points located in the four corners of the LauraLynn site.
- 5.4.3 The mobile patrol security company check the perimeter of the Little Oak building for any open doors or windows.
- 5.4.4 The mobile patrol security company are available to staff and Action 24 if a patrol unit is needed to visit the site outside of the twice nightly visits. They will escalate any serious incident to the Garda Siochana and they will link in with the staff in LauraLynn House, Hazel House or Willow View if required. See Appendix 2 - Security Process LauraLynn

**6.0 Management, Storage and Retention of CCTV Recordings**

**6.1 Purposes of CCTV Surveillance:**

Security: To assist in providing for the security of all staff, visitors, volunteers, contractors, children and adults in the Service; to periodically monitor and protect LauraLynn 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 all staff, visitors, volunteers, contractors, children and adults in the Service; to assist in the resolution of incidents involving workplace hazards, injuries or near misses; to assist in the processing of allegations/claims against LauraLynn.

To enable LauraLynn to respond to legitimate requests from third parties for CCTV footage of incidents e.g., for legal proceedings or insurance investigations.

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

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### 6.2. Location & Operation of Overt CCTV Cameras

- 6.2.1 CCTV cameras are only used within the Service and its grounds to monitor areas to which the general public and families service users have access. (Refer to Appendix 1 for a list and map of all camera locations).
- 6.2.2 The use of CCTV cameras does not infringe on the privacy of staff, volunteers, visitors, contractors, children or adults. Use of covert cameras is not permitted in the Service.
- 6.2.3 The images recorded by the CCTV system are stored on a network video recorder (NVR). Images are retained for a maximum of 30 days on each digital recording system which is located in a secure location on site that is only accessible by authorised users.

### 6.3 Location & Operation of Analytic CCTV Cameras

- 6.3.1 There are 4 x analytic CCTV cameras located at the rear of the site. This area is used for service vehicles and is not generally used by visitors, staff or service users outside of office hours.
- 6.3.2 The cameras are monitored daily by Action 24 from 11pm to 6.30am. If the cameras are activated by unauthorised access to this monitored area, then an audible warning will be made to ask the person(s) to leave the area. If the person(s) continue to act suspiciously then the monitoring company will contact the mobile patrol security company to visit the site. See Appendix 2 - Security Process LauraLynn.

### 6.4 Signage

- 6.4.1 Security and CCTV Signs are displayed in a prominent place and state the purpose for processing and contact details for further information where they can be clearly seen by staff, service users and the public. See Appendix 3 - Security and CCTV Signage.

### 6.5 Installation Upgrades & Maintenance

- 6.5.1 The CCTV and intruder alarm system must be supplied and installed, tested and commissioned by a certified CCTV Installer. The installer must be accredited to NSAI Standard EN 50132-1 or equivalent standard. The CCTV and intruder alarm system is maintained in accordance with manufacturer's recommendations. Internal & external cameras and other system components are maintained annually in line with the terms and conditions of the contract agreement for the system.

### 6.6 Processing of Images

- 6.6.1 All requests to view CCTV footage must be sent by an authorised person to the Security Administrator at [security@lauralynn.ie](mailto:security@lauralynn.ie)

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- 6.6.2 Each digital recorder records images to a hard disc. Images are accessed individually at each recorder. If images are required to be held for evidential purposes the selected images can be saved to a USB key upon approval by two of following authorised persons the CEO, HOO or the Quality, Safety and Risk Manager.
- 6.6.3 Access to the playback is controlled by the Security Administrators and is password protected.
- 6.6.4 Where a request has been made to playback/review CCTV recordings in relation to an incident, an authorised person shall be present. The authorised personnel shall be either the CEO, Quality, Safety and Risk Manager, Head of Operations or Operations Manager

**7.0 Procedure for Handling Access Requests**

**7.1 Access to and Disclosure of Images to Third Parties**

- 7.1.1 The Quality, Safety and Risk Manager, CEO and/or HOO will consider all requests for access to images by third parties. Requests will be approved or denied in accordance with guidance provided in this policy, General Data Protection Regulations and Freedom of Information legislation.
- 7.1.2 Access requests by An Garda Síochána shall be processed where such processing is necessary and proportionate for preventing, detecting, investigating or prosecuting criminal offences. Requests are approved by the two of the following authorised persons QRS Manager, CEO or HOO.

Verbal requests are sufficient to allow for the viewing of the footage. However, verbal requests for copies of footage must be followed up with a formal written request using LauraLynn’s ‘CCTV REQUESTS – Third Party Request Form’ (see Appendix 5). A log is maintained by QRS Manager of all requests.

**7.1.3 Other Third-Party Access**

Disclosure of information to other third parties is made in strict accordance with the purposes of the system and is limited to the following authorities:

- Security administrators and specific staff in Facilities and Operations \*
- Legal or insurance representatives of data subjects (with written consent of data subjects) \*\*
- LauraLynn insurers/assessors \*\*
- In exceptional cases, to others to assist in the identification of a victim, witness or perpetrator in relation to a criminal incident \*\*
- CCTV company for service/repair and to pixelate images \*\*\*.

**7.1.4 Where requests for third party access are met, a record will be kept of:**

- The date and time at which access was allowed or disclosure made;

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- The identification of the third party who was granted access;
- The reason for allowing access and the extent of the information shared.

**7.2 Subjects Access Requests**

7.2.1 Under the General Data Protection Regulations individuals have the right to access their personal data including their image in CCTV recordings.

7.2.2 All requests must be made in writing and should be forwarded in the first instance to the DPO (Data Protection Officer) either by email and completing a 'DSAR (Data Subject Access Request) Form - (see Appendix 4).

7.2.3 Requests must include the date, time and location where the CCTV image was recorded. ID may be required. LauraLynn aims to respond promptly and at the latest within one month of receiving a valid request.

7.2.4 Downloading of footage is carried out by the Security administrator. Recorded material is handled with care and in a confidential manner to ensure complete regard for individual privacy. Footage is downloaded onto a memory stick; a copy is given to the requester and a copy is retained by the QRS department in a secure network location.

Individuals should also be asked whether they would be satisfied with merely viewing the images rather than requiring a copy.

Careful consideration must be given to requests for access that would involve disclosing images of third parties. This may be overcome by blurring or disguising the images of third parties but this cannot be carried out in-house.

7.2.5 The footage in question is retained until the purpose for which it was downloaded has ended, at which point the footage is safely and permanently deleted.

7.2.6 In the event that a request for access is denied, the DPO will document the identity of the individual making the request, the date of the request and the reason for refusing to supply the images/copy requested.

**8.0 Procedure for Requesting Installation of Additional CCTV Cameras**

8.1 Requests for the installation of additional cameras on LauraLynn premises shall be made in writing (by email) by a member of the EMT or HOO/Ops Manager to the relevant Security Administrator.

**9.0 Procedure for Removal of CCTV Cameras**

9.1 Where evidence shows that a CCTV camera location is no longer justified, the camera shall be decommissioned at the request of the Security Administrator.

**10.0 Evaluation and Audit**

10.1 This policy and associated procedure will be amended as necessary to reflect any changes to best practice, law or substantial organisation changes. It is reviewed and evaluated for

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appropriateness and effectiveness every two years at a minimum/according to expiry and unless otherwise stated.

**11.0 Appendices**

- 11.1 Appendix 1: Location of CCTV Cameras
- Appendix 2: Security Process LauraLynn
- Appendix 3: Security and CCTV Signage
- Appendix 4: Data Subject Access Request Form (DSAR)
- Appendix 5: Third Party Access Request Forms

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**Appendix 1 – Location of CCTV Cameras**

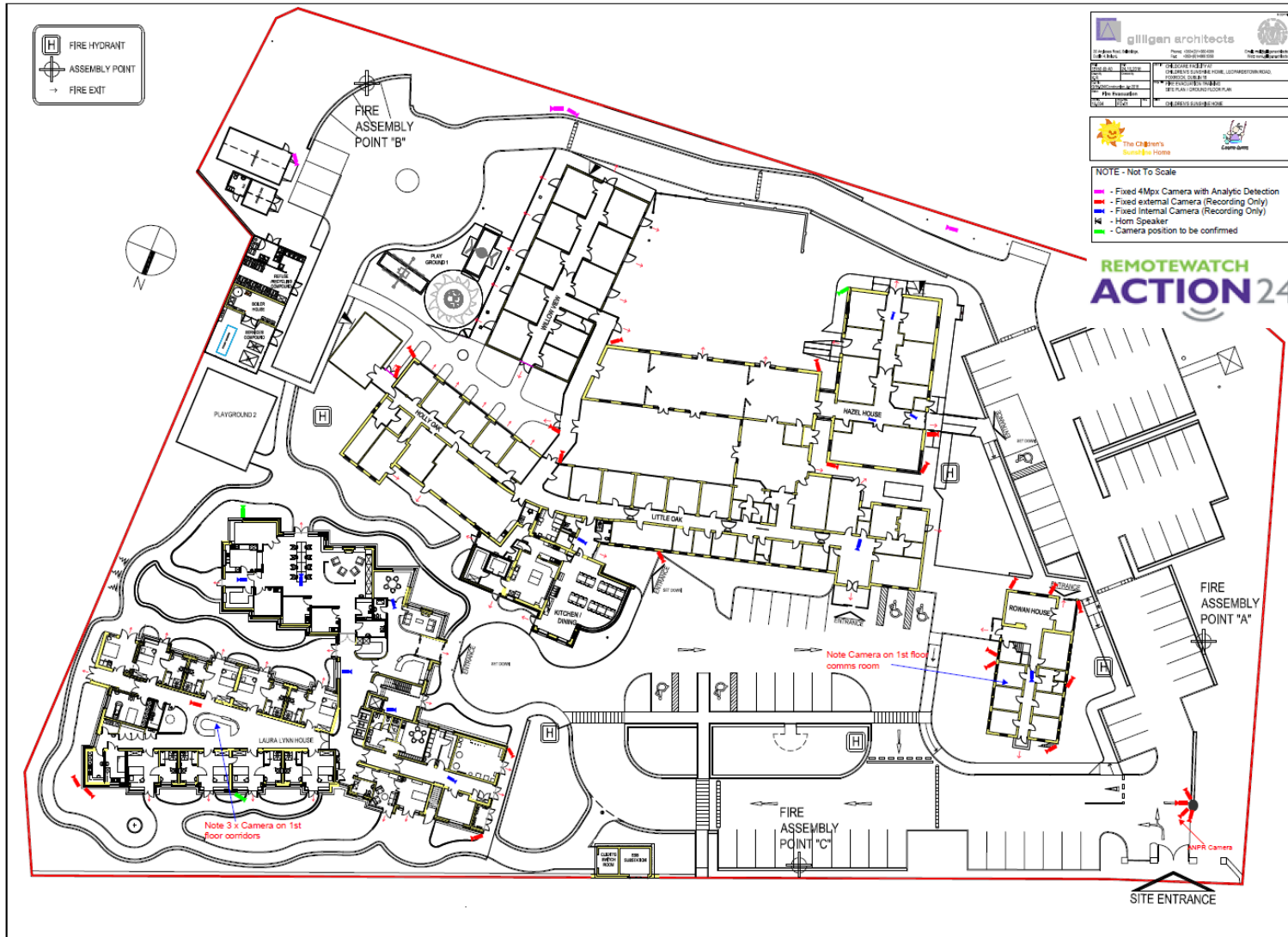
<p><b><u>Rowan House:</u></b> Main Entrance Lobby Ground Floor Corridor Fire Exit First Floor Comms Room</p>	<p><b><u>Little Oak:</u></b> Main Entrance Reception Little Oak Exit from Staff Room</p>	<p><b><u>Holly Oak/Willow View:</u></b> Main Entrance Lobby Willow View Playground Holly Oak Bedroom Fire Exit &amp; Willow View Main Corridor Fire Exit Multi-Sensory Garden at Willow View Main Corridor Fire Exit Multi-Sensory Garden at Willow View Day Room Exit</p>
<p><b><u>Hazel House:</u></b> Main Entrance Lobby Main Corridor Fire Exit (Towards Willow View) Main Corridor Fire Exit (Towards Service Delivery Road) Hazel House Main Entrance Hazel House Set Down Area Multi-Sensory Garden at Hazel House Exit</p>		
<p><b><u>LauraLynn House:</u></b></p>		
<p><b><u>Ground Floor:</u></b> Main Entrance Lobby Main Entrance Reception Bedroom Area Main Fire Exit (Towards Gardens at Rear) Staff Area Main Fire Exit (Towards Carpark) Living Area Main Fire Exit (Towards Playground) Living Area Main Fire Exit via Kitchen Lobby (Towards Gardens) Link Corridor Main Fire Exit (Towards Garden) Lift Lobby (Stair Core 1) Main Fire Exit (Towards Carpark)</p>	<p><b><u>First Floor:</u></b> Lift Lobby Main Corridor Fire Exit (Towards Stair Core 2)</p>	<p><b><u>External Cameras:</u></b> LLH Side Lane Front (Near Butterfly Suite) LLH Rear Lane (Near Silver Park) LLH Side Lane Rear (Near Memorial Tree) LauraLynn Playground LLH Blue Pod LauraLynn Grounds at Rear Boundary Wall (LLH Rear Lane)</p> <p>External Locations, wall mounted unless otherwise stated.</p> <p>Main Entrance Gate (Pole Mounted) Vehicle Registration Plate Camera (Pole Mounted) Staff Carpark opposite Rowan House (Pole Mounted) Internal Courtyard Playground Staff Carpark opposite Rowan House Visitor Carpark opposite Little Oak (2 No.) Visitor Carpark outside Rowan House Visitor Carpark opposite Rowan House</p>

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<p><b><u>Monitored Cameras</u></b></p> <p>Back Road Entry (side of Hazel House) Shed Overview Back road exit (Willow View) Service parking area</p>		

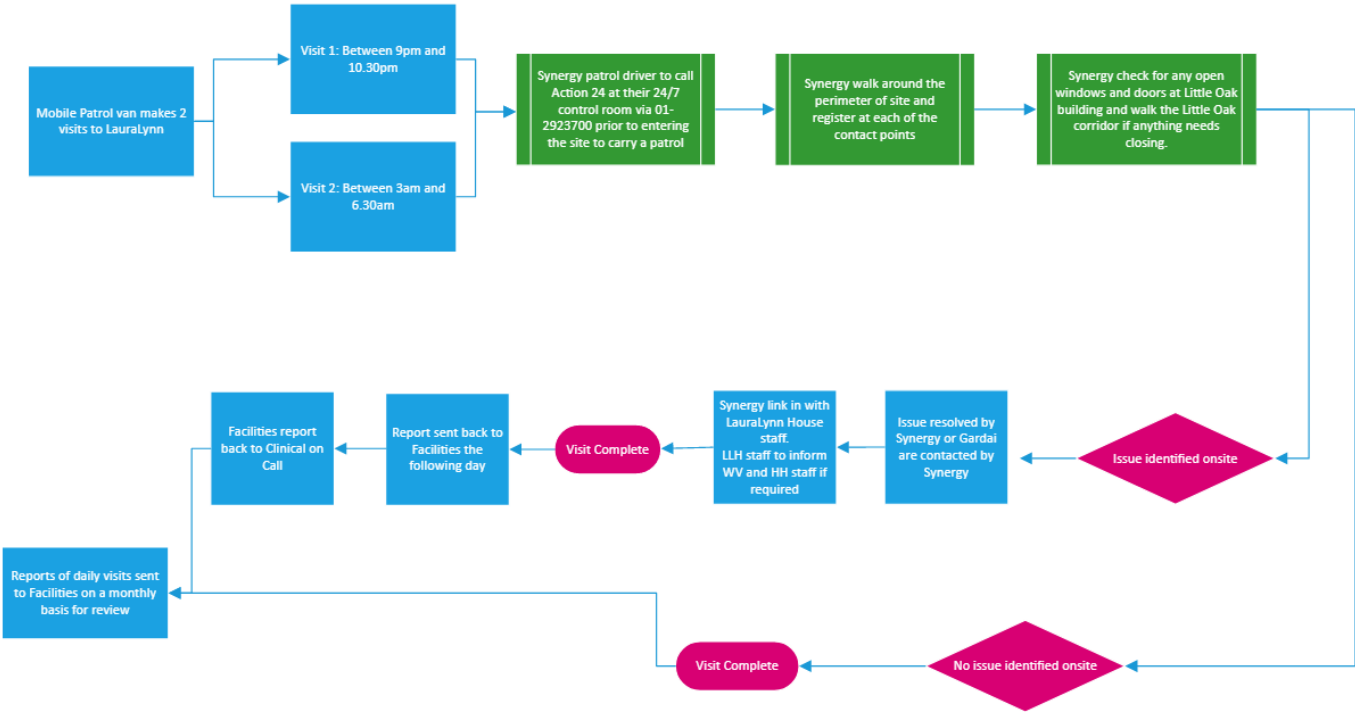
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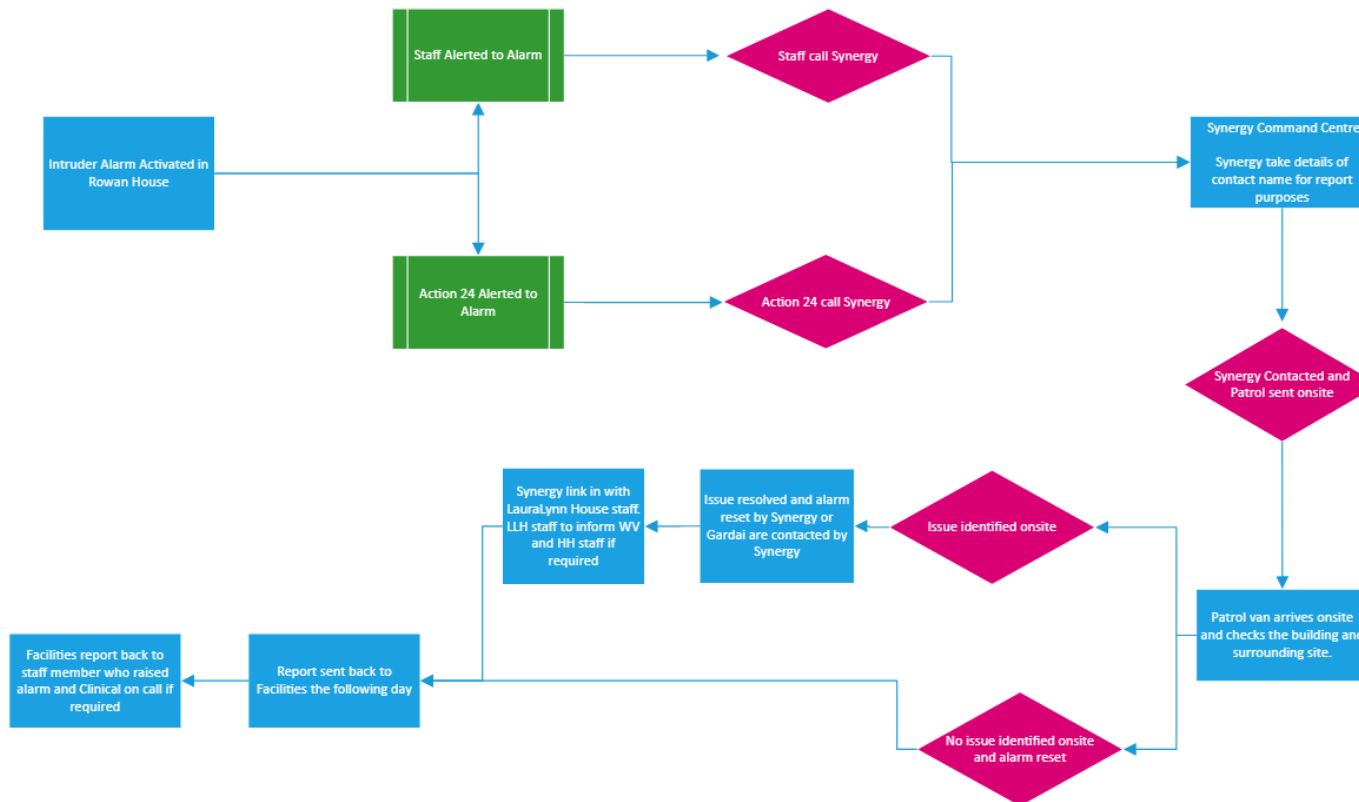
**Appendix 2 – Security Process LauraLynn**

**Regular Mobile Patrol Security Process provided by Synergy**



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Call Process for Intruder Alarm in Rowan House



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**Appendix 3 – Security and CCTV Signage**



1. Sign for Security Mobile Patrols and Keyholding service provided by Synergy



2. External Sign indicating CCTV in Operation provided by Action 24



3. Internal Sign indicating CCTV in Operation

**Appendix 4 - Data Subject Access Request Form (DSAR)**

**Data Subject Access Request Form**

The information you supply in this form will only be used for the purposes of identifying the personal data you are requesting access to your data and responding to your request. You are not obliged to complete this form to make a request, but doing so will make it easier for us to process your request quickly.

Request for a copy of personal data [note verbal requests will be accepted]  
Data Protection Acts 1988-2018

Important: We may require proof of the applicant’s identity (e.g. passport or driver’s license) and address (e.g. utility bill) to ensure that the person making the access request is acting legitimately.

**Section A – please complete this section**

**Full Name:** \_\_\_\_\_

**Postal Address:** \_\_\_\_\_

**Telephone / email:** \_\_\_\_\_

\*we may need to contact you to discuss your Access Request

**Section B – please complete this section**

I, \_\_\_\_\_ (insert name) wish to have access to data that I believe the Service retains on me as outlined below (please include the name of service(s) and any other relevant details to your access request)

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Please tick the appropriate box and read the instructions which follow it.

<input type="checkbox"/>	I am the data subject. I enclose proof of my identity.
<input type="checkbox"/>	I am acting on behalf of the data subject. I have enclosed the data subject’s written authority and proof of the data subject’s identity and my own identity

<b>Checklist: Have you:</b>	<b>Yes</b>	<b>No</b>
1. Completed the Access Request Form in full?	<input type="checkbox"/>	<input type="checkbox"/>
2. Attached a photocopy of proof of your identity and address if required?	<input type="checkbox"/>	<input type="checkbox"/>
3. Signed and dated the Access Request?	<input type="checkbox"/>	<input type="checkbox"/>
4. Assign an internal reference number?	<input type="checkbox"/>	<input type="checkbox"/>

*(Please return this form to: Data Protection Officer, LauraLynn, Ireland’s Children’s Hospice, the Children’s Sunshine Home, Leopardstown Road, Foxrock, Dublin 18. [DPO@lauralynn.ie](mailto:DPO@lauralynn.ie) If you are not satisfied with the outcome of your rectification request you are entitled to make a complaint to the Data Protection Commission who may investigate the matter for you.)*

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	<h2>Security Policy</h2>	<b>Ref No: 2.6</b>
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Signed (Print Name): \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

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# Security Policy

Ref No: 2.6

## Appendix 5 - Third-Party Access Request Forms

### CCTV REQUESTS THIRD PARTY ACCESS REQUEST FORM DETAILS OF THIRD PARTY

#### Details of Third-Party Requester

Full Name: \_\_\_\_\_

Postal Address: \_\_\_\_\_  
\_\_\_\_\_

Garda Badge No: (Where appropriate): \_\_\_\_\_

Telephone / email: \_\_\_\_\_

\*we may need to contact you to discuss your Access Request

#### Details of Request

I request CCTV access as follows:

View CCTV footage

Copy of CCTV footage

Reason for request:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date of Recording: \_\_\_\_\_ Time of Recording: \_\_\_\_\_

Start Download (Time): \_\_\_\_\_ Stop Download (Time) \_\_\_\_\_

(Please return this form to: Data Protection Officer, LauraLynn, Ireland's Children's Hospice, the Children's Sunshine Home, Leopardstown Road, Foxrock, Dublin 18. [DPO@lauralynn.ie](mailto:DPO@lauralynn.ie) If you are not satisfied with the outcome of your request you are entitled to make a complaint to the Data Protection Commission who may investigate the matter for you.)

Signed (Print Name): \_\_\_\_\_ Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Official Use Only	DATE	TIME	By Who	Where
System Request Received				
System Request Authorised				
Rationale:				
Copied to Memory Stick				
No. of copies made				
Copies stored				
Copy given to Requester				

Signed (Print Name): \_\_\_\_\_ Date: \_\_\_\_\_

Signature: \_\_\_\_\_

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