



## CCTV PRIVACY NOTICE

By entering an ETB premises, you acknowledge that your images shall be processed by the CCTV system of WWETB . This Privacy Notice gives you some helpful information about who we are, what CCTV images we collect, why, who we share it with and why, how long we keep it, and your rights. If you need more information, please see our Data Processing Policy and/or our CCTV policy available at [www.wwetb.ie](http://www.wwetb.ie)

1. We are WWETB . Our address and contact details are Head Office, Ardcahan, Ardcahan Business Park, Co. Wexford, Y35 P9EA and telephone number is 053 9123799. We provide primary level education, secondary level education, second chance education; further education and training including apprenticeships; Youthwork, community-based education programmes; outdoor education; outreach programmes, specialist programmes e.g., through Music Generation and other programmes/courses as maybe delivered/funded/sponsored in whole or part or in co-operation with other bodies/agencies etc. For further information, see section 1 of our Data Processing Policy available at [www.wwetb.ie](http://www.wwetb.ie)
2. We operate Closed Circuit Television Systems (“**CCTV**”) on our premises 24 hours a day CCTV is used at external points on the premises (e.g. at front gates, in the carpark, etc.) and at certain internal points (e.g. front desk/reception area, corridors etc). In areas where CCTV is in operation, appropriate notices will be displayed. We use CCTV for security purposes; to protect premises and assets; to deter crime and anti-social behaviour; to assist in the investigation, detection, and prosecution of offences; to monitor areas in which cash and/or goods are handled; to deter bullying and/or harassment; to maintain good order and discipline and to ensure the Code of Behaviour is respected; to provide a safe environment for all staff and students; for verification purposes and for dispute-resolution, particularly in circumstances where there is a dispute as to facts and the recordings may be capable of resolving that dispute; for the taking and defence of litigation. For further information on how we use this CCTV and the legal basis for same, please go to section 2 of our CCTV Policy available at [www.wwetb.ie](http://www.wwetb.ie) This CCTV Privacy Notice and the CCTV Policy should be read together with the WWETB Data Processing Policy, a copy of which is available at [www.wwetb.ie](http://www.wwetb.ie)
3. We share and transfer CCTV images/recordings with third parties. We share information with our CCTV provider/s. For example, we may show the CCTV images to a student’s parent/guardian as part of a Code of Behaviour process. In appropriate circumstances, we also share CCTV images/recordings with An Garda Síochána (for the investigation, detection and prevention of offences); with social workers, HSE, and/or TUSLA (in respect of any child protection and/or child safeguarding matters); to the Department of Education and/or any section 29 Appeals Committee (in relation to any Code of Behaviour, suspension, or expulsion process); with the Teaching Council (where we are legally required in relation to any process under the Teaching



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Council Acts 2001 – 2015, including fitness to teach investigations); to the ETB’s insurance company and the ETB’s legal advisors (for dispute resolution and litigation purposes) etc. For further information on who we share your data with, when and in what circumstances, and why, please see section 3 of our Data Processing Policy available at [www.wwetb.ie](http://www.wwetb.ie)

- 4. Where we engage service providers from a third country or international organisation i.e., outside of the European Economic Area, we will do this in compliance with the GDPR by assuring appropriate safety measures are in place to protect the data. Where it is not possible to achieve compliance, we will not engage such providers or transfer data to them.
- 5. We do not engage in Automated decision making/profiling. Any data/footage captured by our CCTV system will always be analysed and interpreted by a staff member of the ETB before any conclusion is drawn or decision is made in relation to that data/footage.
- 6. CCTV is generally held for 30 days. In certain circumstances, CCTV recordings may be held for longer, for example:
  - (a) Where a break-in or theft is recorded (in which case they will be held and passed to An Garda Síochána, and/or the ETB’s insurance company and/or legal advisors).
  - (b) Where an injury/accident occurs (in which case CCTV may be retained and may subsequently be passed to the ETB’s insurance company, its legal advisors, the Health & Safety Authority.
  - (c) Where a breach of the Code of Behaviour is reported resulting in a student being disciplined, the recordings will be retained to be viewed by parents of the affected student (if the images can be appropriately redacted/pixelated to protect the personal data of third parties), the Board of Management, the ETB, and/or a duly constituted section 29 appeals committee convened by the Department of Education and Skills, for the purposes of hearings, appeals, dispute resolution and/or verification purposes.

These examples are not exhaustive, and there will be other situations where the CCTV is retained for longer than 30 days where there is a legal basis and/or we are legally required to do so.

- 7. You have the following statutory rights, that can be exercised at any time:
  - (a) Right to complain to the Data Protection Commission
  - (b) Right of access.
  - (c) Right to rectification.
  - (d) Right to be forgotten.
  - (e) Right to restrict processing.
  - (f) Right to data portability.
  - (g) Right to object and
  - (h) Right to not be subject to a decision based solely on automated processing, automated decision making/profiling.

For further information, please see section (7) of our Data Processing Policy available at [www.wwetb.ie](http://www.wwetb.ie) , or alternatively contact our Data Protection Officer.

- 8. We have appointed a Data Protection Officer (DPO) on a permanent basis, Their contact details are [dataprotectionofficer@wwetb.ie](mailto:dataprotectionofficer@wwetb.ie) 058 41780