Ref: PGP109



POLICY: Closed Circuit Television (CCTV) Policy

ADOPTED: Approved UR 2019#01

AMENDMENTS: None to Date

REVIEW: March 2024

Introduction

This Policy details the accepted uses and management of the CCTV system of Mary Immaculate College (MIC). The CCTV system is managed by the Buildings Services Department. A key consideration in operating the CCTV system is ensuring that the privacy of individuals is protected in line with the General Data Protection Regulation, Data Protection Acts 1988 -2018 and the Freedom of Information Act 2014. These Acts provide for the collection, processing, retention and eventual destruction of personal data in a responsible and secure way, thereby avoiding its misuse. For further information, see MIC's Records Retention Schedule.

Monitored CCTV cameras are installed at various locations on the MIC Campus and record footage with associated date and time. Notices placed at entrances to and in prominent locations across the Campus signal this use of CCTV.

Day to day responsibility for the College's CCTV system and the data generated rests with the Buildings Manager.

All CCTV footage is the property of MIC.

Purpose of CCTV

The purposes for which the CCTV system is installed on Campus include the following:

- Assist in providing for the security & safety of students, staff and visitors;
- Monitoring and protecting College buildings and facilities;
- Assisting in the prevention and detection of crime;
- Facilitating the identification, apprehension and prosecution of offenders in relation to crime and public order offences;
- Assisting the College in the processing of allegations/claims against the College;
- Enabling the College to respond to legitimate requests from third parties for CCTV footage of incidents;
- Facilitating the investigation of staff/student/contractor disciplinary offences;
- Assisting the enforcement of College car parking regulations and management of these car parks;
- Identifying traffic movement problems around Campus.

Although 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.

Management of CCTV footage

All recorded CCTV footage must be adequately secured and access to footage must be password-controlled. The Buildings & Maintenance Manager and his/her nominee(s) are authorised to operate and monitor the CCTV system. Such nominees must be authorised in writing by the Buildings & Maintenance Manager and a record of such authorisation be maintained by the Buildings & Maintenance Manager.

The Buildings & Maintenance Manager will ensure that all authorised personnel are fully briefed in respect of operational, administrative and legislative requirements that arise from the management of the CCTV system and recorded footage. Authorised personnel are responsible for ensuring that the system is only used in an appropriate manner in conformance with legislative and any legal requirements that may arise. Breaches of these Procedures may result in Employee Disciplinary Matters & Termination of Employment being invoked.

Retention of CCTV footage

In accordance with the Data Protection Acts, CCTV footage is retained for no longer than is necessary. In general, footage will only be retained for a period of 30 days unless valid reasons arise.

Footage from the CCTV system retained as evidence

The Buildings & Maintenance Manager or his/her nominee will maintain the following log of retained recorded CCTV footage:

- the date and nature of the matter recorded;
- the date(s) of when the CCTV footage was copied;
- record of any disclosure of CCTV footage;
- record of when and how the CCTV footage was securely deleted

CCTV footage will be retained for as long as required where it serves as evidence of matters such as those set out above, as identified by the Buildings & Maintenance Manager or his/her nominee(s).

In the event that CCTV footage is to be retained the following procedure shall apply:

• The relevant footage will be downloaded onto an appropriate storage device by the Buildings & Maintenance Manager or his/her nominee(s) and retained in a secure location;

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- The copy will be securely retained until written confirmation from the relevant College manager is received to confirm that the matter is concluded.
- Upon receipt of such confirmation, the footage will be securely deleted by the Buildings Superintendent or his/her nominee(s);

Hard copy print outs of CCTV footage

Hard copy print outs of CCTV footage are subject to the same controls as those set out above.

Request for access to CCTV footage

Access to recorded footage is restricted and carefully controlled by the Buildings & Maintenance Manager or his/her nominee(s) not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact should the footage be required for such purposes.

Requests for access must be made in writing to the Buildings & Maintenance Manager, Mary Immaculate College, St. Circular Road, Limerick within 15 days of the incident occurring. Recorded footage will be disclosed in consultation with the Information & Compliance Manager. Such disclosure will be in compliance with the Data Protection Acts 1988 & 2003, GDPR and with the College's Data Protection Policy.

Appeals

Any appeal regarding the implementation of these procedures should be referred in writing to the Information & Compliance Manager, Mary Immaculate College, Limerick whose decision will be final.

For such assistance or further information, contact:

Information Compliance Office,
Mary Immaculate College,
South Circular Road,
Limerick
Tel: +353-61-204511