

Closed Circuit Television (CCTV) & Body Worn Camera System Operating Procedures

Corporate Secretary's Office August 2023

1. INTRODUCTION

- 1.1 These Procedures detail the accepted uses and management of the University of Limerick CCTV and Body Worn Cameras (BWCs) system which is managed by the Buildings & Estates Department of the University.
- 12 CCTV and BWC systems managed by University subsidiary and associated companies and other companies operating on Campus are the subject of separate procedures.
- 1.3 A key consideration in operating the CCTV and BWC system is ensuring that the privacy of individuals is protected in line with the Data Protection Acts 1988-2018 and Regulation (EU) 2016/679 ("Data Protection Law"). This Law provides 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 the University's Data Protection Policy (available at https://www.ul.ie/policy-hub).

2. CCTV SYSTEM AT THE UNIVERSITY OF LIMERICK

- 2.1 Monitored CCTV cameras are installed at various locations on the University of Limerick Campus and record footage with associated date and time. This use of CCTV is signalled by notices placed at entrances to and in prominent locations across the Campus
- 22 BWCs are miniature video cameras and microphones which capture a user's interaction with other individuals. BWCs are usually attached to a user's clothing. BWCs are worn by all security officers while on duty in the University of Limerick. Prior to a BWC being activated for the purpose of capturing CCTV footage of an incident, the officer must clearly inform any third parties present that their BWC is being activated to record CCTV footage of the situation.
- 23 The operator of the BWC must state very clearly "I AM TURNING ON MY BODY WORN CAMERA. YOU ARE ABOUT TO BE RECORDED". It is very important to ensure that this warning is captured on the CCTV footage of the camera as evidence that the individuals were informed of the usage of the BWC. For this purpose, the operator must state "THE BODY WORN CAMERA IS NOW RECORDING" immediately once recording commences.
- 24 Day to day responsibility for the University's CCTV/BWC system and the data generated rests with the University's Security and Events Manager.
- All footage from CCTV and BWCs are the property of the University.

3. PURPOSES OF CCTV

- 3.1 The purposes for which the CCTV system is installed on Campus and BWCs worn by officers include:
 - to assist in providing for the security & safety of students, staff and

visitors;

- monitoring and protecting University 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 University in the processing of allegations/claims against the University;
- enabling the University 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 University car parking regulations and management of these car parks;
- identifying traffic movement problems around Campus.
- 32 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.

4. MANAGEMENT OF CCTV and BWC FOOTAGE

- 4.1 All recorded CCTV footage must be adequately secured and access to footage must be password controlled.
- 42 The Security and Events Manager and his/her nominee(s) are authorised to operate and monitor the CCTV system. Such nominees must be authorised in writing by the Security and Events Manager and a record of such authorisation be maintained by the Security and Events Manager.
- 4.3 The Security and Events 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/BWC system and recorded footage.
- 4.4 Authorised personnel are responsible for ensuring that the system is only used in an appropriate manner in conformance with any regulatory and legal requirements that may arise.
- 45 Breaches of these Procedures may result in Statute No. 4 of the University of Limerick: Employee Disciplinary Matters & Termination of Employment being invoked.

5. RETENTION OF CCTV FOOTAGE

5.1 Recorded footage on the CCTV system

5.1.1 In accordance with Data Protection Law, CCTV/BWC footage is retained for no longer than is necessary. In general, footage will only be retained for a period of 31 days unless valid reasons arise, including those set out in section 3.1 above.

52 Footage from the CCTV system retained as evidence

- 5.2.1 The following log of retained recorded CCTV/BWC footage will be maintained by the Security and Events Manager or his/her nominee(s):
 - the date and nature of the matter recorded;
 - the date(s) of when the CCTV/BWC footage was copied;
 - record of any disclosure of CCTV/BWC footage;
 - record of when and how the CCTVBWC footage was securely deleted.
- 5.2.2 CCTV/BWC footage will be retained for as long as required where it serves as evidence of matters such as those set out in Section 3.1 above, as identified by the Security and Events Manager or his/her nominee(s).
- 5.2.3 In the event that CCTV/BWC footage is to be retained for evidence, the following procedure shall apply:
 - the relevant footage will be downloaded onto an appropriate storage device by the Security and Events Manager or his/her nominee(s) and retained in a secure location;
 - the copy will be securely retained until written confirmation from the relevant University manager is received to confirm that the matter is concluded. Upon receipt of such confirmation, the footage will be securely deleted by the Security and Events Manager or his/her nominee(s);
- 5.2.4 Hard copy printouts of CCTV/BWC footage are subject to the same controls as those set out above.

6. REQUEST FOR ACCESS TO RECORDED FOOTAGE

- 6.1 Access to recorded footage is restricted and carefully controlled by the Security and Events 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.
- 62 Requests for access must be made in writing to the Security and Events Manager, Buildings & Estates Department, University of Limerick, Limerick within 15 days of the incident occurring. Recorded footage will be disclosed in consultation with the Corporate Secretary's Office. Such disclosure will be in compliance with Data Protection Law and with the University's Data Protection Policy.

7. APPEALS

7.1 Any appeal regarding the implementation of these procedures should be referred in writing to the Data Protection Officer, Corporate Secretary's Office, University of Limerick, (or by email to: <u>dataprotection@ul.ie</u>), whose decision will be final.