



# STAR OF THE SEA COLLEGE

## CCTV and Vape Detection Policy

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Star of the Sea College is a Catholic Independent Girls' school, founded by the Presentation Sisters in 1883. Since 2014, Star of the Sea College has been a member of Kildare Ministries.

At Star of the Sea College we hold the care, safety and wellbeing of our students as a central and fundamental responsibility of our College. Our commitment is drawn from, and inherent in, the teaching and mission of Jesus Christ, with love, justice and the sanctity of each human person at the heart of the gospel (CECV Commitment Statement to Child Safety, July 2022)

The person of each individual human being, in his or her material and spiritual needs, is at the heart of Christ's teaching: that is why the promotion of the human person is the goal of the Catholic School (Congregation for Catholic Education 1997, n.9).

### **Purpose**

This policy outlines the requirements relating to the design, installation and responsible management and use of closed-circuit television (CCTV) and E-cigarette (Vape) detection systems at Star of the Sea College (the College).

CCTV and Vape Detection are security and safety measures that the College can use to support a safe and secure school environment. It can deter inappropriate behaviour such as vandalism and theft and provide evidence to verify incidents.

The installation and use of CCTV and Vape Detection systems within the College can support and enhance its ability to provide a safe and secure school environment for students, staff and visitors. The College will ensure that privacy is considered when installing and using CCTV systems and Vape Detection.

Installing CCTV systems and Vape Detection on school grounds can support the College by:

- acting as a deterrent and reducing the likelihood of vandalism and theft
- deterring misconduct and inappropriate behaviour
- helping to verify incidents on school grounds to support an evidence-based response
- reassuring students, staff and visitors that they are protected when on school grounds.
- Identifying breaches of the Drug and Alcohol policy and Respectful Relationships Policy

### **Definitions**

#### CCTV footage

Closed-circuit television (CCTV) refers to broadcasts transmitted to a limited number of closed monitor/s for the purpose of video surveillance. The video is often recorded for set periods of time and the footage used for evidence.

#### Remote access

The ability to access the CCTV system remotely (while not on location).



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### Vape Detection

The system is designed to detect atmospheric particles that may indicate the use of e-cigarettes. Sends and records alerts.

### **Installation of CCTV and Vape Detection systems**

The installation of CCTV at the College must be approved by the principal after research and discussion by the Leadership Team. Input from the IT Committee may be sought, including on the initial design, to ensure the design meets the College's needs. The vape detection systems must not have a camera or be easily modified to have a camera.

This design can then be used to engage contractors for quoting purposes and any recommended installers and as part of an approved procurement process.

The College will document:

- A final marked-up site plan (the installer may create this) indicating:
  - the location of the CCTV camera, vape detector and related equipment
  - supporting signage
  - a copy of the wording of the supporting signage being installed

### **Consultation**

Before installing a CCTV system, the Principal must consult with and consider the views of the Leadership Team and College Board. The Principal may also wish to extend consultation to other school community members, including staff, students and parents.

Following consultation, if the Principal decides to install a CCTV system, the College must inform the College community of the intention to install and operate a CCTV through appropriate channels such as:

- newsletter article
- statement on the College website
- posted material within the College grounds.

### **Location of CCTV Cameras and Vape Detection**

The Principal, in collaboration with the IT Manager, is responsible for determining the appropriate location of cameras related to this policy.

### **Prohibited locations of CCTV Cameras**

CCTV Cameras must not be installed in the following areas:

- toilets
- change rooms
- dressing rooms
- showers
- other areas where individual privacy is paramount.



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### Prohibited locations of Vape Detection

- None

### Covert surveillance

As a general rule, the College is not permitted to undertake covert (or hidden) surveillance using CCTV systems. Notification of the installation of Vape detectors and cameras will occur via the newsletter to the College community as informed by a community communication plan

### Signage

The College is responsible for ensuring signage notifies staff, students, visitors, contractors and the general community that CCTV is in operation.

Signage must be:

- Situated at site entry and exit points
- easily understood by all parties, including people from non-English speaking backgrounds – signs should include a mix of text and symbols
- clearly visible, distinctive and located in areas with good lighting, placed in normal eye range and large enough so that any text can be read easily
- checked regularly for damage/theft/vandalism.

The provider should supply the signage as part of the installation process.

### CCTV privacy notice

In addition to signage, a CCTV privacy notice will be published on the College website or other online school community information platforms.

The privacy notice should:

- explain the purpose of the CCTV system
- provide the location of CCTV Cameras and Vape Detection (either by listing the locations or providing a map)
- explain how to request a record of any footage
- provide a link to this policy for further information on how the College may use the CCTV system and who may access the footage.



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### Management and operation of CCTV

The Principal is responsible for ensuring the CCTV system is managed and operated per this policy and keeping a record of the staff members nominated to access the system.

All school staff with responsibility for using and managing the CCTV systems must be:

- Appropriately trained in using and managing the CCTV system and made aware of the requirements contained in this policy
- Made aware that access to live and recorded footage may be subject to review by the Principal and IT Manager, who may be required to justify any access to footage.

### Access to CCTV footage

CCTV footage must only be accessed, including by remote access, for the purposes set out in this policy and only by the following people:

- the Principal and staff nominated by the Principal in writing
- any other people permitted or required by law.

When accessed, the staff will document the following at a minimum:

- date of the incident
- time of the incident
- location of the incident
- the reason why the viewing has been requested
- the names of those involved (if applicable)

The College will record each occasion CCTV footage is accessed through the College helpdesk system. The helpdesk system will be the access register.

### Use of CCTV footage

CCTV footage may only be used for the following purposes.

#### Live CCTV footage

Live CCTV footage may be used by authorised school staff to:

- Provide situational awareness of incidents that pose a risk to the health or safety of the College community or following a school security alarm activation or another trigger
- Monitor for activities that pose a risk to the health or safety of the College community or property where:
  - There is a reasonable belief that an incident will occur
  - Monitoring the CCTV live footage will help to identify the persons involved and support the College to reduce the risk of the incident occurring or reoccurring



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- Provide the College with visual coverage during emergencies.
- To be used for college analytics, to assist in building planning, event planning, and risk mitigation.  
Data to be captured to assist in the above but not limited to:
  - frequency of motion, occupancy counts, and pedestrian flow.

### Recorded CCTV footage

Recorded CCTV footage may be used by authorised school staff to:

- Prevent, verify and investigate incidents involving:
  - the criminal behaviour of anyone on College grounds
  - staff misconduct
  - Other inappropriate behaviour of students, staff, visitors or public members. For example, the College may use CCTV footage of incidents to help inform decisions about student management.
- verify and investigate other incidents involving students, staff or visitors (for example, incidents in which a person has sustained injury, loss or damage on school premises)
- support College Leadership with incident review and debriefing.
- provided at the request of a party to the footage as part of the CCTV privacy notice

### Prohibited uses

In addition to the prohibited locations of CCTV Cameras and Vape Detection above, CCTV footage must not be used:

- to monitor non-school facilities or public places
- to monitor staff performance
- for covert surveillance except per this policy

### **Use of Vape Detection alerts**

Vape detection alerts may be used to:

- Notify staff to investigate a breach of the drug and alcohol policy
- Support the access of CCTV in common spaces

### **Disclosure of CCTV footage to external parties**

Live or recorded CCTV footage may only be disclosed to external parties as described in this policy or when permitted or required by law.

Examples of when CCTV footage may be disclosed externally include:

- live or recorded footage disclosed to law enforcement agencies where required or permitted by law
- when required under a court order.



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### **Showing footage to students, their parents and staff involved in incidents**

When using CCTV for the purposes listed in this policy, the Principal may show specific footage of an incident to those directly involved, including relevant staff, students and/or their parents, provided:

- the Principal considers it appropriate and necessary to support parents to understand the specifics of an incident that has taken place so they can provide appropriate support to their child or for a staff member to understand an incident better
- it would not cause a health, wellbeing or safety risk to any other person and
- it would not be an unreasonable intrusion into another person's privacy.

The College prohibits the distribution of footage unless the purpose of distribution does not breach the privacy or identification of persons.

Footage will not be released or disclosed to staff, student or parents

### **Recorded material – storage and retention**

The Principal or a nominated staff member are responsible for ensuring CCTV recorded images are stored securely and retained for a minimum of 30 days. Footage must be indefinitely stored if it is used for an investigation.

If no request has been made to view or access CCTV footage and no specific or significant incidents have taken place, the data can be disposed of after 60 days.

When CCTV footage is used to investigate and document specific or significant incidents, including an alleged incident, the footage must not be destroyed and stored in a secure location indefinitely.

### **Maintenance of CCTV systems**

Review arrangements for the management of CCTV systems, including confirming that the equipment is working effectively, will be conducted on a termly basis. Where system issues are discovered, the College will engage an approved contractor to rectify these issues.

The College undertakes regular maintenance checks on recording equipment by an approved contractor or qualified personnel to ensure the system is maintained in good working order.

### **Complaints**

Parent complaints relating to CCTV or vape detection systems should be managed using the College Grievance Policy.

The College will manage complaints from other members of the community.



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Responsible Officer	Deputy Principal Students
Approved by	Principal
Approved and commenced	November 2022
Review by	November 2024
Relevant Legislation	<ul style="list-style-type: none"> <li>• Surveillance Devices Act 1999</li> <li>• Public Records Act 1973</li> <li>• Privacy and Data Protection Act 2014</li> <li>• Private Security Act 2004</li> <li>• Charter of Human Rights and Responsibilities Act 2006</li> <li>• Evidence Act 2008</li> </ul>
Related Policies & Procedures	Behaviour Management Policy Child Safety and Wellbeing Policy Drug Issues Policy ICT staff policy Privacy Policy Respectful Relationships Policy Supervision Policy
Version	1



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