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## Surveillance Camera Policy

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### Rationale

This Policy

- outlines the guidelines for the use of surveillance cameras (including CCTV) at Trinity Catholic College to ensure the safety and well-being of students, staff, and visitors, while adhering to the principles of the Privacy Act 2020. This policy applies to all cameras installed and operated by the school, including any temporary or covert surveillance.
- gives guidance about the rights of students, parents, staff, volunteers, visitors, and members of the public, in terms of personal data captured and stored via the camera system.
- acts as a privacy notice and will be made available to members of the school community and the public via our college website.

### Purpose

Information is only collected for a necessary and lawful purpose (Principle 1 of the Privacy Act 2020)

The College's purpose in using surveillance cameras is:

- To ensure student and staff safety: To deter and detect bullying, violence, and other harmful behaviours.
- To protect school property: To prevent and investigate vandalism, theft, and other property damage.
- To monitor illegal access to the school premises: To ensure only authorized individuals are on site.
- To investigate incidents: To provide evidence in the event of an incident, such as an accident, crime, or disciplinary matter.

### Privacy Impact Assessment

Before introducing cameras into any area of the school, we consider the impact on privacy as a result of using camera surveillance, including potential breaches of the Privacy Act.

In particular we consider:

- the vulnerability of children and young people (Privacy Act s 22, Principle 4)
- the availability of other strategies to address security, behaviour, and safety issues (e.g behaviour management plan)
- whether the camera is positioned in a place where people would have a reasonable expectation of privacy (e.g. bathrooms, including entrances)
- the risk that this surveillance breaches other legislation such as the Human Rights Act 1993.



## Guidelines

- Cameras will be placed in locations where there is a legitimate need for surveillance, such as entrances, exits, hallways, common areas, and spaces hired to outside users.
- Signage about the use of surveillance cameras will be visible to people accessing our school grounds
- When a temporary camera is used within the College, signage will be visible where the camera is positioned, and students and staff will be notified about its position via Edge Notifications prior to the camera being operational.
- Cameras will be positioned to minimize intrusion into areas where individuals have a reasonable expectation of privacy.

Cameras will NOT be placed in:

- Classrooms (except in exceptional circumstances, with strict controls and prior consultation with the Privacy Commissioner). Any such placement would need to very clearly meet the threshold of necessity under Principle 1 of the Privacy Act 2020.
  - Staffrooms
  - Changing rooms

Access to CCTV footage may be given to Police for the prevention and detection of crime or identification of a child at risk.

Cameras will not be used to monitor staff performance nor routinely monitor staff or students. This would be a breach of Principles 4 and 10 of the Privacy Act (2020).

### Temporary/Covert Camera Installations

Covert surveillance (i.e., where individuals are not aware they are being recorded) will only be used in exceptional circumstances, such as when:

- There is a serious and imminent threat to the safety of individuals.
- There is a reasonable suspicion that a serious criminal offense has been committed.

Covert surveillance must be authorised by the principal (or their delegate) and must comply with the requirements of the Privacy Act 2020 (including section 47). The use of covert surveillance will be subject to strict controls and will be regularly reviewed to ensure its necessity. Temporary/covert cameras are to be removed immediately upon conclusion of any investigation.

This Policy does not apply to:

- the use of video recording and the video conferencing
- the livestreaming of events for community viewing
- the recording of lessons and other teaching and learning activities by students or staff

This policy does not authorise the use, interception, duplication, transmission of video for any other purpose. Data captured for the reasons specified in this policy will not be used for any commercial purpose.



## Surveillance Camera Procedure

- a. The College's Privacy Officer is responsible for overseeing the surveillance system. The Principal is the Privacy Officer.
- b. The day-to-day operation of the surveillance system will be the responsibility of the Business Manager, or such person that the Business Manager appoints, in concert with the Principal, in his absence.
- c. Only staff approved by the Principal shall be permitted to monitor and review video recordings through the surveillance system. This approval shall be granted when such monitoring is relevant to the function of the staff member's role.
- d. An online log is kept by the Business Manager and the Principal, showing details of access to the surveillance system, the reason for the access, and the approved staff member accessing the surveillance system. The Principal will review the log at least termly to ensure the surveillance system is being used for valid reasons.
- e. Any breaches of this policy and procedure will be investigated by the Principal (or by the Board if the Principal is responsible for the breach) and the findings reported to the Board.
- f. This policy, the related procedure, and the operation of the system will be reviewed annually. Once the review is completed, an evaluation will be reported to the Board.
- g. This policy will be available on the College website.
- h. Recordings will be retained for a maximum period of one school term (based on available storage space) after which it will be overwritten. Any downloaded recordings will be retained for a period of time that is reasonable and maybe longer than one term, as long as it is for purposes consistent with this policy. No data will be removed from the system unless approved in writing by the privacy officer.
- i. No recordings will be shared to anyone outside of the approved staff unless the privacy officer (Principal) gives approval for the sharing of the recording, and the approval meets the requirements of the College's Privacy Policy (eg Principle 6).
- j. The College will take all reasonable steps to ensure that images are secure, and to limit unauthorised access. Recordings will only be viewed in a non-public, secure space.

**Review:** This policy will be reviewed triennially in accordance with the policy and procedures review cycle.

**Reviewed:** April 2025

### Related Resources and Legislation:

Trinity Catholic College Privacy Policy

Trinity Catholic College Privacy Statement

Bullying Prevention and Response Policy and Procedure

Privacy Act 2020

Human Rights Act 1993

Search and Surveillance Act 2012

Privacy Principles Checklist Camera Surveillance TCC 2025