

Closed Circuit Television (CCTV) Policy

Department:	Business Support
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Purpose:

To provide guidance on the management and use of the Council's Closed-Circuit Television (CCTV) network.

Principles and objectives:

- To provide a consistent framework for the introduction and use of CCTV cameras in the district
- To meet legal privacy and other obligations and ensure systems provide quality personal information handling practice.

Scope:

The policy applies to all CCTV equipment operated by Central Otago District Council or operating on CODC land. It applies to all Council staff and contractors.

Cameras used for the inspection of council assets, such as inspecting the inside of pipes, is not considered CCTV footage for the purposes of this policy.

Policy:

CCTV cameras operate in Central Otago for the following purposes:

- To improve security and deter offending, and to detect and capture evidence of offending, to increase public safety and protect council assets and finances.
- To monitor and manage traffic.
- To assist council staff in executing regulatory functions.

Placement

CCTV cameras are situated in locations which are clearly linked with the camera's specific purpose. Their placement must not interfere with the normal activities of the space nor

include private areas within public spaces and facilities (e.g., changing rooms).

No camera is hidden from view.

Council may, in rare and exceptional circumstances, use covert CCTV for short-term investigative purposes only.

Signage

Individual cameras and/or camera areas are clearly signposted. Signs are of a size and style to be readily visible and understandable.

New cameras

Before installation, all new camera systems are assessed against the following criteria by the following officers:

Criteria	Explanation	Officer
Technical considerations	Ensure all technical equipment is appropriate to comply with the policy and any related procedures	Information Services Manager/CCTV Administrator
Privacy impact	Ensure camera and location is consistent with privacy provisions, including compliance with this policy and any related procedures	Privacy Officer
Staff impact	Ensure appropriate notification has been given to all staff and contractors	People and Culture Advisor
Other CCTV considerations		Property and Facilities Manager

Standard budget and approval processes apply.

Monitoring and user access

Specific roles and responsibilities have been assigned for the operation of the CCTV network.

Monitoring and user access is limited to the officers assigned to each role. Accessing CCTV footage without specific assignment to one of these roles, or outside of the permissions granted within each role, is treated very seriously. Access is able to be monitored digitally.

Role	Access	Officer
CCTV Administrator	Full system access to all CCTV camera features and programming.	Delegated officers within the Information Services team – delegated by the Information Services Manager
CCTV Operator	Majority system access for all CCTV cameras on their site including some programming ability, live view, playback, and export.	Delegated officers within the Property and Facilities team – delegated by the Property and Facilities Manager
CCTV View Only	Live view, playback	<p>Access may be provided to an individual camera or portion of the network for specific purposes only.</p> <p>This is limited to the minimum access required to fulfil the purposes of their role and the operation of the camera.</p> <p>CCTV view only access must be set for each camera and approved by the Privacy Officer, Property and Facilities Manager, and People and Culture Advisor.</p> <p>View only access may be granted to contracted officers.</p>

Storage and streaming

All information is stored securely in line with the Protection of Information and Information Systems policy and standards; the Information and Records Management Policy and associated Good Practices and Business Rules; and the Password Business Rules.

Recording devices/servers for CCTV cameras are installed in a secure location as agreed upon with the CCTV Administrator.

All recorded footage is used only for the purpose which it is collected. Footage is stored for no more than 30 days as standard practice.

Where an incident has occurred, footage will be captured and provided to the Police or Council officer undertaking an investigation or otherwise managing the incident. This footage may be kept through the investigation of the incident and any subsequent prosecution or action.

Information access by the Police

The Police may access footage on short notice.

This access is provided under criteria set in a Memorandum of Understanding. The Memorandum of Understanding is managed by the Property and Facilities Manager and Privacy Officer.

Information access by individuals

Recorded footage is confidential to Council.

An individual whose activities have been recorded by a CCTV camera has a right to access and view that personal information in accordance with the Privacy Act 2020 provided it is readily retrievable. Access can only be refused on one of the grounds set out in sections 27 to 29 of the Privacy Act.

Applications to view footage are treated as a request for personal information. They will be handled in accordance with the Local Government Official Information and Meetings Act 1987 (LGOIMA) and the Privacy Act 2020.

The privacy of other individuals appearing in the footage must be maintained.

Staff impact

Council recognises the impact of ongoing monitoring on staff.

An impact statement must be prepared for each new CCTV camera before installation, with consideration of the impact on staff.

CCTV cameras must not be used for monitoring staff, outside of the terms given in the impact statement.

Inappropriate use of CCTV

Council officers who are authorised to operate and access CCTV footage are accountable for their actions. CCTV footage access is recorded and monitored to ensure it is not used for any purpose other than for the legitimate business of the Council and in line with this policy.

The Council will investigate any suspected inappropriate use of CCTV. Any breaches will be managed under the terms of the Performance Management Policy.

Enquiries and complaints

Any person who has queries about this Policy or the operation of CCTV cameras should in the first instance, contact the Council's Customer Services Team to be directed to the appropriate member of staff.

Any complaints regarding the operation of the Council CCTV network or the collection of footage are to be directed to the Chief Executive and will be investigated through the Council's complaints procedure. If the complaint relates to an issue of privacy, a complaint may also be made to the Privacy Commissioner.

Relevant legislation:

- Evidence Act 2006
- Local Government Act 2002
- Local Government Official Information and Meetings Act 1987
- Privacy Act 2020

Related documents:

- Information and Records Management Policy
- Privacy Policy
- Performance Management Policy
- Procurement Policy
- Protection of Information and Information Systems series - Cybersecurity Policy and Standards
 - Password Business Rules
- LGOIMA Request Policy