



## **SHCS CCTV POLICY**

### **Rationale:**

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System (the **System**) at St Hilda's Collegiate (the **School**), and to ensure the System is managed in such a way that safety and security are enhanced; the privacy rights of the School community and the public are respected; and applicable laws and policies are complied with.

It also serves as a notice and a guide to data subjects (including students, parents, staff, volunteers, visitors to the school and members of the public) regarding their rights in relation to personal data recorded via the System.

The System is administered and managed by the School, which acts as the Data Controller. This policy will be subject to review from time to time.

All cameras are fixed and are in plain sight on the school premises. The school does not use CCTV for covert monitoring or monitoring of private property outside the school grounds. The cameras and areas covered are listed here:

1. The main archway on Cobden Street, overlooking the entrance to the school and entrance to the students' toilets.
2. On the corner of St Hilda's on Cobden Street, cityside, looking towards main door entrance.
3. On the corner of St Hilda's on Royal Terrace end, on the corner of the gym looking down taking in the bins and side entrance to the gym.
4. On Geraldine House, overlooking the lower quad and both entrances to the gym.
5. At the corner of the Arts Building overlooking the artificial turf and taking in the entrances to the Arts Building.
6. On the corner of the Arts' building overlooking entrance to the school carpark where the school van is parked.

### **Purpose:**

The School's purposes in using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the School believes these purposes are all lawful and connected with a function or activity of the School. Data captured for the purposes below will not be used for any commercial purpose:

- To protect students, staff, volunteers, visitors and members of the public with regard to their personal safety.
- To protect the School buildings and equipment, and the personal property of students, staff, volunteers, visitors, and members of the public.
- To support the police and community in preventing and detecting crime and assist in the identification and apprehension of offenders.
- To monitor the security and integrity of the School site and deliveries and arrivals.
- To monitor contractors when carrying out work duties.

- To monitor and uphold, when necessary, behaviour expectations among staff in line with the Code of Conduct.
- To monitor and uphold, when necessary, behaviour expectations among students in line with the Behaviour Policy.

## **PROCEDURE:**

### **Positioning**

- Locations have been selected that the School reasonably believes require monitoring to address the stated purposes.
- No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities. No images of public spaces will be captured except to a limited extent at site entrances, facility entrances and the sports' turf.

### **Maintenance**

- The CCTV System will be operational 24 hours a day, every day of the year. The System Manager will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.

### **Supervision of the System**

- Staff authorised by the School to conduct routine supervision of the System may include the Property and Maintenance Manager and the ICT Manager.
- Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

### **Accuracy of Data**

- The School will take reasonable steps to check CCTV images are accurate, complete, relevant, and not misleading before using them.

### **Storage of Data**

- The day-to-day management of images will be the responsibility of the Property and Maintenance Manager, who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.
- Images will be stored for no more than 4 weeks, and will be automatically over-written unless the School considers it reasonably necessary for the pursuit of the purposes outlined above, or if lawfully required by an appropriate third party such as the police or local authority.
- Where such data is retained, it will be retained in accordance with the Act and our Privacy Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded in the system logbook. Such data will be reviewed at least every 12 months by the School's Privacy Officer. Where such data is no longer reasonably necessary for one of the purposes outlined above, the Privacy Officer will destroy, delete or permanently anonymise it.

### **Security of Data**

- Images will be stored on the school's files and databases. The School will take all reasonable steps (including technical, physical and/or organisational measures) to keep images safe and secure and to ensure they are protected against loss or unauthorised access, modification, use or disclosure.
- Security measures will include maintaining secure passwords preventing unauthorised access to the images contained in the system logbook, and limiting access to images to those who "need to know".

### **Access to Images**

- Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

- Individuals also have the right to access personal data the School holds on them, including information held on the System, if it has been kept. The School will require specific details including at least the time, date and camera location before it can properly respond to any such requests. Some personal data may be withheld where this is authorised by the Act (for example, to ensure safety).
- The System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are examples when the System Manager may authorise access to CCTV images:
  - Where required to do so by the Principal, the Police or some relevant statutory authority;
  - To make a report regarding suspected criminal behaviour;
  - To enable the Principal or their appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
  - To assist the School in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardian will be informed as part of the School's management of a particular incident;
  - To assist the School in establishing facts in cases of unacceptable staff or contractor behaviour, in which case, the person concerned will be informed as part of the School's management of a particular incident;
  - To data subjects (or their legal representatives) pursuant to an access request under the Privacy Act and on the basis set out above;
  - To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
  - In any other circumstances required under law or regulation.
- Where images are disclosed, a record will be made in the student(s) school file including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).

### **Correction of Images**

- Individuals have the right to ask to correct information the School holds about them, for example if they believe they have been mis-identified in CCTV footage.
- Any requests to correct such information should be referred to the Principal in the first instance.

### **Complaints and Queries**

Any complaints or queries in relation to the School's CCTV system, or its use of CCTV, or requests for copies, should be referred to the Principal in the first instance.

This policy will be reviewed as required or triennially.

Policy Adopted: 12 April 2021 (Date)

Signed:  (Chair, Board of Trustees)