# Operational Policy: BLENNZ Privacy, CCTV and Security Cameras (NAG 6)

## Blind & Low Vision Education Network NZ

## Statement of Intent:

The Blind & Low Vision Education Network NZ (BLENNZ) has a responsibility to ensure a safe and secure environment is provided to ākonga, staff and visitors. This policy ensures that BLENNZ has in place effective procedures to enable it to achieve this aim on any of its sites that have monitored security cameras and/or CCTV. This will include the limited use of video surveillance of both the exterior and interior of the buildings and carpark areas.

Video surveillance will not be used to observe employee work areas or in areas where employees would have an expectation of privacy.

Security arrangements on other BLENNZ sites will be in accordance with the policies and procedures of the respective schools and/or organisations.

## Procedures:

### Purpose of video surveillance system:

The purpose of security cameras located on the exterior of buildings and in carparks is to:

* provide security for ākonga, staff and visitors during out of school hours or at times when BLENNZ sites are closed,
* provide security of buildings, equipment and vehicles.
* act as a deterrent to anyone considering targeting BLENNZ in terms of theft or vandalism.

The purpose of the cameras located in the Homai Campus reception area and immediately outside the entrance doors, is to:

* provide staff in the Open Plan office visual images of people waiting at reception during times when the reception desk is not manned,
* provide security for staff in terms of being able to see, before walking to the door to open it, who is seeking access to the building during times when the automatic doors are locked e.g. after hours, weekends and during school holidays.

### Where the Security/CCTV cameras will be located:

Where these exist, exterior cameras will be located on the outside of buildings and/or on poles in carparks.

The interior camera at the Homai Campus is located in the ceiling of the staff room. This camera looks away from the staffroom and across to the entrance way and automatic doors. It is positioned so that staff in the open plan office can see anyone waiting at reception. Staff in the reception area can only be seen from a distance. Staff working in the library area are not visible.

### Where the Security/CCTV cameras will never be located:

Cameras will never be located in areas where privacy of ākonga or staff could be affected e.g. inside classrooms, therapy areas, residential accommodation, staff work areas, bathrooms etc.

### Where the video surveillance system is monitored:

The reception video camera at the Homai Campus is only able to be viewed from the monitors located in the open plan office area. The security cameras located on the exterior buildings and light poles in the Homai Campus carpark can only be viewed from one monitor located in the open plan office.

The security cameras located at the Christchurch site can be accessed by the security company, the VRC Manager and Administration staff. Security cameras located at the Wellington site can be accessed by the security company and the BLENNZ Coordinator Digital Access and eLearning.

### Who is responsible for the management of the video surveillance system:

The Site Manager is responsible for managing the video surveillance system at the Homai Campus. Security firms contracted by BLENNZ are responsible for managing the systems on national sites. Where no firm is contracted to monitor a national site the responsibility for the management of the surveillance system rests with the local manager in partnership with their line manager. Decisions concerning systems and the use of any system are the responsibility of the Principal.

### Who has access to video recordings and for what purpose:

The internal camera monitoring the reception area and entrance way at the Homai Campus is a live feed camera and recordings are not kept.

Recordings of external security camera footage at the Homai Campus can be accessed for one month from the current date. The Site Manager reviews footage randomly during the week to check the system is operating properly, and on request when footage is sought for a specific purpose e.g. a security breach, theft of a vehicle etc. This is done at the request of a Senior Manager or the Police.

Footage from the security cameras at the BLENNZ Christchurch site can be accessed for 1-3 months dependent upon the amount of movement being captured, after which it is overridden.

Security camera footage at BLENNZ Wellington is stored in the building’s data cabinet. It can be accessed via the security server by the security company, the Homai Campus Site Manager and the Coordinator Digital Access & e-Learning.

### The use of covert cameras:

No covert cameras will ever be used on any BLENNZ site.

Signs will be displayed in the grounds advising that sites have Security/CCTV surveillance.

A full privacy notice will be placed on the BLENNZ website advising which BLENNZ sites have external Security/CCTV surveillance.

### Procedures for requesting video recordings:

In the Privacy Act, principles 10 and 11 say that you may only use or disclose personal information for the purpose you collected it, or for a directly related purpose.

If any external Security/CCTV footage is needed to be disclosed, checks will be made prior to this to ensure any images are accurate, complete, relevant and not misleading to anyone using them.

Public disclosure of any Security/CCTV footage will only occur with the consent of the individual(s) shown in the footage or if the Police have been consulted.

### Archival storage of video recordings related to security incidents:

Security/CCTV images will be protected from loss and authorised access through offsite back up and password access.

Security/CCTV images will only be kept for a specified time and will not be kept for longer than is necessary to achieve their purpose.

### Who should be contacted if they have any enquiries:

In the first instance, staff should contact their line manager.

If members of the public have concerns they should make contact with a Senior Manager or the Principal.

### Complaints process:

Complaints will be handled through processes outlined in the BLENNZ Complaints and Concerns policy.

### Audit and evaluation:

The use of Security/CCTV cameras will be reviewed annually as part of BLENNZ self review and compliance reporting. Any privacy issues will also be discussed at the twice yearly BLENNZ Privacy Committee meetings.

## Supporting Documents:

BLENNZ Concerns and Complaints Policy

[Link to Privacy and CCTV-A guide to the Privacy Act for businesses, agencies and organisations](https://www.privacy.org.nz/news-and-publications/guidance-resources/privacy-and-cctv-a-guide-to-the-privacy-act-for-businesses-agencies-and-organisations/)

[Privacy Act 1993](http://www.legislation.govt.nz/act/public/1993/0028/latest/DLM296639.html)



Approved: …………………… Date: 8 March 2021

(Principal)