



CCTV Policy

Effective 1 January 2024



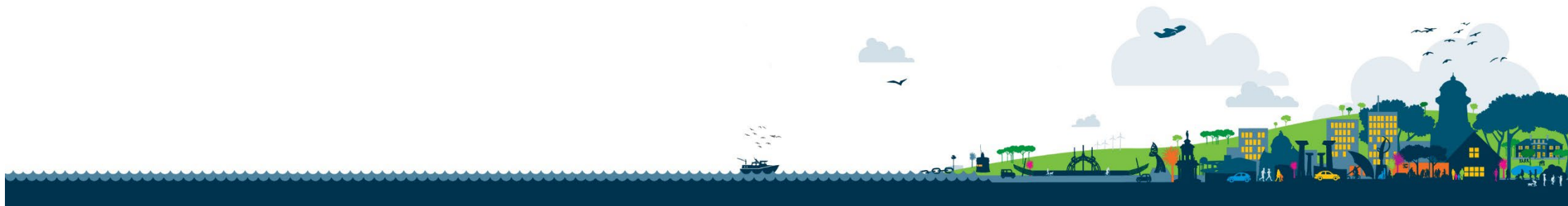
CCTV Policy

Purpose

Council owns and operates a number of CCTV cameras at a number of locations around the Invercargill City District. The cameras have been set up for several purposes, including:

- Enhancing public safety and community wellbeing by deterring and preventing criminal and antisocial behaviour in public places throughout the district.
- Assisting other agencies, including the Police where appropriate, by detecting and providing evidence of potential criminal or other activity.
- Improving staff security in their interactions with the public, in relation to health and safety matters, and in civil defence situations.
- For business improvement, training and quality control in relation to cash handling and other transactions, and for monitoring how busy the front desk is so that staff can be deployed appropriately.
- Assisting Council with its regulatory functions, including by monitoring compliance with regulations, bylaws and other legislation.
- Protecting Council assets including buildings and infrastructure, including monitoring for trespass.
- Managing traffic and monitoring traffic movements in particular areas, including through vehicle and pedestrian counting.

By setting up CCTV cameras, Council incurs obligations under legislation including the Privacy Act (2020). This policy has been developed to explain how Council will operate and use its CCTV network, and ensure adherence to its privacy obligations. This CCTV Policy is to be read in conjunction with Council's Privacy Policy.



Scope

This policy applies to all cameras and similar monitoring devices used, owned, operated or managed by Invercargill City Council, including those in and around Council owned or operated buildings and facilities, body-worn cameras on Council staff, and other cameras that have been installed in public areas for general crime prevention and community safety purposes.

This policy applies to all Council employees, elected members, contractors of Council, and others involved in the authorised operation, maintenance and use of Council cameras.

Definitions

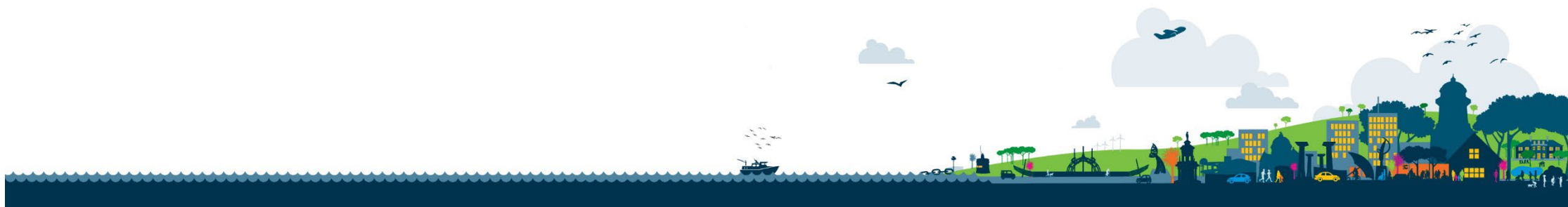
CCTV: In this policy, the phrase “CCTV” is used to mean any type of camera, recording device, or other related technology. It is recognised that CCTV is a legacy term, specific to an increasingly redundant technology. However, it is widely understood to refer to the types of surveillance and monitoring technologies with which this policy is concerned.

Council: Invercargill City Council

Privacy Act: Privacy Act 2020

Camera locations

CCTV Cameras are located throughout the Invercargill City District, on roads and state highways, and at Council owned and/or operated buildings and venues including Te Hīnaki Civic Building, the Civic Theatre, Invercargill Library, Splash Palace Aquatic Centre, Queens Park, Animal Care Facility, He Waka Tuia and the Bluff Service Centre. A full list of fixed camera locations and maps depicting the same are available on the Council website. Before placing new cameras Council must consider the matters identified in the CCTV Privacy Checklist Guidelines.



Each camera is placed in a location determined by Council to clearly achieve the purposes of the system as outlined above. They must not interfere with the usual use of that space.

New cameras will only be installed if Council is satisfied that they are necessary to achieve the purposes of the CCTV system, and if budget so allows. Refer to the Privacy Checklist for New Cameras. The location of any new cameras will be added to the website.

Fixed cameras will only be positioned to observe public locations or Council owned facilities. They will not be positioned to capture images of:

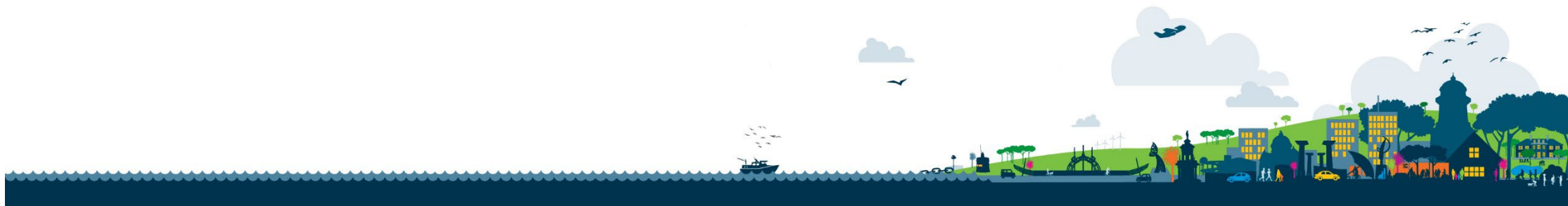
- Private spaces within public areas (such as changing rooms or bathrooms)
- Private residences (except incidentally or unavoidably as part of a wide angle shot or while panning past)
- The insides of buildings (except Council owned buildings)

Body-worn cameras are also used by certain Council officers (such as Parking Wardens or Animal Control Officers) to record interactions while carrying out their official duties. When used the Council officer will inform the individual with whom they are interacting that the wearable camera is in use. Refer to the Invercargill City Council Wearable Video Camera Guidelines.

The use of UAV's is governed by the Civil Aviation Authority. Council has a policy for the use of UAV's in its parks and reserves. Council when using drones for commercial purposes must comply with the Civil Aviation Authority Rules and ensure compliance with the Privacy Act.

Operation of cameras

Cameras capture video images only, not sound. They will operate for the minimum amount of time necessary to achieve their purpose (which may mean constant monitoring in some cases).



Signage

All areas covered by fixed CCTV cameras will be clearly signposted. The signs will:

- Be of a size and design to be readily visible to people entering the vicinity;
- Clearly communicate that cameras are or may be operating;
- Briefly describe why the CCTV system is being used (e.g., “crime prevention cameras in operation” or “traffic management cameras in operation”);
- State that the cameras are owned and operated by Council.

Detailed public notices will be placed on Council’s website to ensure the community is aware of the existence of CCTV.

Live monitoring

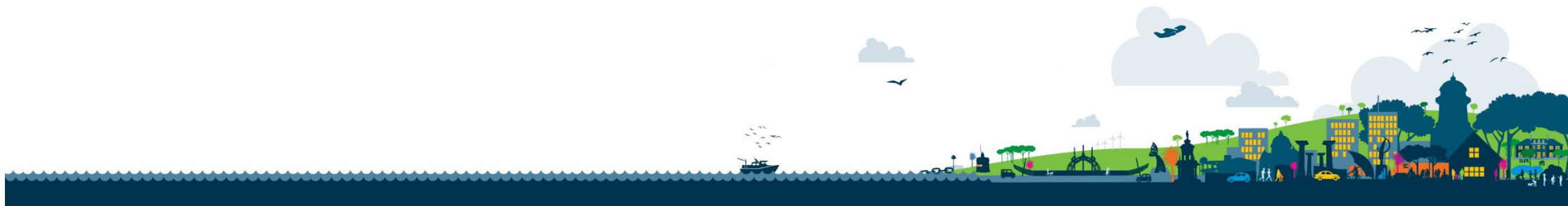
Monitors for live monitoring will be located in secure locations, so that only authorised and trained persons will have access to monitors. All access will be documented. Monitors will not be located in any position where they could be viewed by any unauthorised person.

In accordance with Principle 11 of the Privacy Act, Police may be given direct access to live footage on Council’s CCTV network. Council will ensure that there is at all times an operative Memorandum of Understanding with New Zealand Police which requires Police to comply with their privacy obligations in full.

Storage of footage

All information gathered through Council’s CCTV system will be stored securely at authorised Council locations. The specific storage period for data from each CCTV camera will be specified. Footage is kept for no longer than necessary to achieve its purpose, and will in all cases be deleted within ninety days unless a longer retention period is required for a specific purpose (eg, for evidence in criminal proceedings).

Any third parties whose services are used for storage of footage will be required to comply with the Privacy Act. No third party services or products will be used by Council unless it is satisfied that Council will be able to continue to meet its privacy obligations.



Use of footage

All recorded CCTV footage will be used strictly and solely for the purpose or purposes for which it was collected. Under no circumstances will Council authorise use of footage outside of this.

Access to recorded footage

Access to CCTV footage is strictly controlled to ensure the safety and security of this information. This may include measures such as restricting access to named roles only, use of passwords, encryption or locks, and record-keeping of all access.

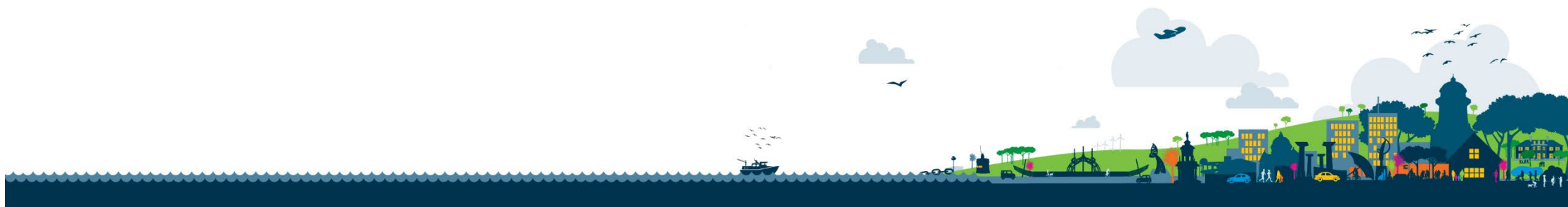
Recorded footage of an individual and their activities is personal information and that individual has a right to view it in accordance with the Privacy Act. Requests by individuals for access to CCTV footage are treated as a request for personal information, and are handled in accordance with the Privacy Act and the Local Government Official Information and Meetings Act 1987.

From time to time we may share recorded CCTV footage showing identifiable images of people. This will only occur if we were required to do so under any laws or regulations, or in the course of legal proceedings or other investigations. Footage may be shared with New Zealand Police or other public agencies. If Police or other agencies wish to access recorded CCTV footage, they are required to complete the CCTV Footage Request Form.

Council will take any alleged inappropriate access to CCTV footage very seriously, and investigate the circumstances fully. Access will be recorded and monitored to ensure footage is not used for any unauthorised purpose.

Roles and responsibilities

Individuals may be assigned viewing, access, retrieval, maintenance, and installation privileges depending on their role within Council. An up to date list of levels of approved privileges is available on Council's website at all times.



Complaints

Any complaint regarding any aspect of Council's CCTV should be made in the usual manner in accordance with Council's Customer Complaint Policy, which is available on Council's website. Alternatively, if the complaint concerns a privacy matter, an approach can be made to the Privacy Commissioner directly.

Revision History:

Effective Date: 1 January 2024

Review Period:

This policy will be reviewed every six (6) years unless earlier review is required due to legislative change, or is warranted by another reason requested by Council.

New Review Date:

1 January 2030

Associated Documents / References:

Privacy Policy (A4783866)
Privacy Checklist for New Cameras (A4778210)
CCTV Footage Request Form
Map of CCTV camera locations
CCTV Privileges
Wearable Video Camera Guidelines

Supersedes:

Relevant sections of Privacy Policy

Reference Number:

A5049895

Policy Owner:

Chief Risk Officer

