



Camera Surveillance Procedure

Rationale

The purpose of the Camera Surveillance Procedure (the “Procedure”) is to ensure that security cameras and/or closed-circuit television (CCTV) security systems (the “System”) are managed in a way that:

- enhances safety and security
- respects the privacy rights of staff, students, contractors and volunteers at Kavanagh College (the “College”) and the public
- aligns with the College’s Privacy Policy and Privacy Statement
- ensures compliance with applicable legislation

This Procedure also 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 System.

Scope

This Procedure applies to the installation and use of permanent and/or temporary surveillance cameras and/or closed-circuit television (CCTV) security systems inside and outside buildings within the property boundaries of Kavanagh College.

Temporary surveillance cameras may be used when there is a reasonable belief that student safety and wellbeing, and/or property and asset protection, will be enhanced through surveillance for a defined time period.

Surveillance may occur 24 hours a day, seven days a week, according to identified need and as directed by the Principal.

Cameras will not be used to monitor staff performance.

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

Privacy

1. Signage will be visible where cameras are positioned
2. Cameras will be installed in positions to avoid capturing images where individuals have a reasonable expectation of privacy including bathroom and changing areas
3. Communication about the operation of the System will occur through the newsletter annually, and the student and staff notification app when temporary cameras change surveillance area



Purpose

The College's purpose in using the System is as follows:

- To protect the personal safety of individuals (including, but not limited to, students, staff, contractors, volunteers and visitors)
- To protect the College's assets and property, and privately owned assets, against criminal behaviour, including theft and vandalism
- To deter criminal and anti-social behaviour
- To support the investigation of criminal and anti-social behaviour including the identification and apprehension of persons committing offences on the college site

Procedure

1. The College's Privacy Officer is responsible for overseeing the System. The Principal is the Privacy Officer.
2. The day-to-day management of the 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.
3. Only staff approved by the Principal shall be permitted to monitor and review video recordings through the System. This approval shall be granted when such monitoring is relevant to the function of the staff member's role.
4. An online log is kept by the Business Manager and the Principal, showing the details of access to the System, the reason for the access, and the approved staff member accessing the System. The Principal will review the log at least termly to ensure the System is being used for valid reasons, and report to the Board on findings.
5. This Procedure will be available on the College website.
6. 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.
7. 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 Procedure.
8. 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.
9. 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 Procedure will be reviewed according to the Kavanagh College Board's triennial programme of self-review.

Reviewed: July 2022

Related Resources:

Kavanagh College Privacy Policy

Kavanagh College Privacy Statement

Privacy Act 2020

Bullying Prevention and Response Policy and Procedure