

Policy on CCTV

For the Board of Proprietors and Board of Trustees

PURPOSE

To ensure that Woodford House video recording and closed circuit television (CCTV) security systems are managed in such a way that:

- safety and security are enhanced
- the privacy rights of the Woodford House community and the public are respected, and
- applicable laws and policies are complied with.

SCOPE

This policy applies to the installation and use of Woodford House-owned video security and CCTV cameras in and around Woodford House buildings.

All references to video security and CCTV systems throughout this policy are to those systems which are designed and installed with the intent and ability to record video for the purposes of enhancing safety and physical facility security. This policy does not apply to:

- use of video recording and CCTV technology for video conferencing
- video recording of classes and other teaching and learning activities, and the subsequent use of such video recordings, or
- live web streaming cameras installed for public interest viewing.

The policy governs all Woodford House-owned CCTV camera system installations.

DEFINITIONS

Primary CCTV Manager: The person designated by the Principal to have oversight of the provision and management of video security and CCTV systems across Woodford House, and to ensure compliance with this policy.

Designated Users: Person(s) approved by the Principal to manage the provision of video security and CCTV systems for specific reasons, such as traffic management, incident investigations, and criminal investigations.

Privacy Officer: The senior staff member holding appointment as Privacy Officer under section 23 of the [Privacy Act 2020](#).

Privacy Principles: 13 principles contained in the [Privacy Act 2020](#) that stipulate how information can be collected and used, and people's rights to gain access to that information and ask for it to be corrected.

CCTV: Closed circuit television used to transmit a signal to a specific place(s).

IP Cameras: Internet protocol (IP) cameras which utilise the protocol used most by Local Area Networks (LANs) to transmit video across data networks in digital form.

Internal CCTV: Cameras that are situated within buildings.

External CCTV: Cameras that are situated within the grounds of Woodford House.

CONTENT

1. Purpose of Monitoring Systems

- a. CCTV recording and access to CCTV footage governed by this policy is permitted solely for the purpose of enhancing safety and security. This policy does not authorise use, interception, duplication, transmission or other diversion of video and CCTV technologies for any other purposes.
- b. In this policy, safety and security purposes are those which involve:
 - i. the protection of individuals (including, but not limited to, students, staff, and visitors)
 - ii. the protection of School-owned and/or operated property, buildings and critical infrastructure
 - iii. the protection of personal property
 - iv. the taking of action in relation to behaviour that breaches the Student Handbook or Boarding Contract or other safety policies.
 - v. the taking of action in relation to behaviour that breaches the Staff Code of Conduct or other safety policies.
 - vi. the deterrence of criminal behaviour
 - vii. the investigation of criminal behaviour including the identification and apprehension of persons committing offences on School grounds.

2. Protocol for the Use and Operation of Monitoring Systems

- a. CCTV recording and the use of video footage will be conducted in a way that is consistent with this Policy and other relevant Woodford House policies, and in particular the Privacy Policy. The recording of images based on personal or demographic characteristics (e.g. race, gender, sexual orientation, disability, etc.) or so as to unreasonably intrude on situations where there is an expectation of privacy is prohibited under this policy.
- b. The use of CCTV cameras with audio recording capabilities is not permitted.
- c. Cameras may be recording continuously (24 hours a day, seven days a week) and may also be monitored in real time in accordance with the provisions of this policy.
- d. Logs of all downloads must be automatically recorded within the servers and will be enabled to identify the person undertaking the download. Download logs shall be available for audit purposes to the Woodford House Privacy Officer.

- e. All Designated Users granted approval to access Woodford House CCTV systems must receive appropriate training in the technical, legal, and ethical parameters of appropriate camera use. Training shall include the proper operation of the equipment and infrastructure and, where appropriate, its maintenance.
- f. The list of Designated Users granted approval to access or download images must be recorded in writing and retained by the Principal and the Primary CCTV Manager. All approved Designated users must acknowledge in writing, receipt of training, their acceptance of this Policy, and acknowledge that any breach of the requirements of this Policy may result in disciplinary action under the terms of their employment with Woodford House.

3. Installation and Configuration of CCTV Systems

- a. Any and all cameras to be installed will be approved and agreed by the Principal.
- b. The School is required to retain records of all new video security components' locations, costs, camera descriptions, camera capabilities, makes and model numbers.
- c. Qualified security technicians must install CCTV security systems and arrange for network provision. CCTV installations and network provision must meet the requirements of this Policy and any other relevant policies, such as Privacy policy, IT security and procurement policies.
- d. Installation of cameras with audio recording enabled is not permitted.
- e. IP (Internet Protocol) video used for security purposes of this policy must always be restricted to a secure private network or VPN which may be accessed only by authorised persons. No CCTV system may be accessible from the public internet (with the exception of those utilising an approved VPN or free-to-access webcams).
- f. Cameras must be static, have a fixed location and be programmed so as to avoid capturing images of individuals in circumstances where they have a reasonable expectation of privacy including, but not limited to bathrooms, dressing rooms, locker rooms and private dwellings (including views through windows and rear gardens).
- g. Signage advising that cameras are in operation shall be installed at sufficient appropriate locations, both near the CCTV cameras and at the perimeter of the CCTV system's range (before individuals enter the range of cameras), to ensure as far as reasonably possible that users of an area are aware that they may be subject to CCTV surveillance.

- h. Signage should make clear that Woodford House owns and operates the CCTV cameras and systems.

4. Records Retention

- a. Recordings will be retained for a period of approximately 30 days (based on available storage space) at which time footage will be automatically overwritten. Downloaded recordings will be retained for so long as is reasonably required for purposes consistent with this policy.
- b. Servers containing recorded footage will be housed in a secure location with access by authorised personnel only.
- c. Servers shall be regularly updated with the appropriate firmware as identified by Information Technology Services to ensure they have the appropriate security updates.

5. Access to Recorded Information

- a. Only Designated Users approved by the Principal shall be permitted to have access to recorded footage. Approval to access CCTV recordings shall be granted where such access is relevant to the functions of the staff member's role. Access to recorded footage is governed by Clause 6 below, and in line with the purposes set out in Clause 1.
- b. The Principal will only approve female Designated Users to access the internal cameras for the purposes of CCTV listed in Clause 1. Two Designated Users must be present at any time when accessing the internal cameras for the purposes of CCTV listed in Clause 1.
- c. Designated Users will be members of the Woodford House Senior Management Team, or any other role deemed relevant for the functioning of the staff member's role. Designated Users will seek support and advice from another Designated User to determine whether accessing recorded footage meets the purpose at Clause 1.

6. Use and Disclosure of Recorded Information

- a. The viewing, downloading and provision of recordings to others may be carried out only by the Principal, Primary CCTV Manager, Privacy Officer or a Designated User. Any downloading and provision of recordings shall be solely for a purpose recognised by this Policy.
- b. A record of all accesses to CCTV images by external parties shall be made by the person authorising the downloading or provision, before any downloading or provision is undertaken. This includes a record of the purpose of the downloading or provision acknowledged

- c. Requests from students/staff (other than requests by an individual for that individual's own personal information) or outside agencies for the downloading and/or provision of footage will be actioned only upon receipt of a completed Request to Review CCTV form, the requirements of which form shall be approved by the Woodford House Privacy Officer from time to time. The Principal will approve or decline the request having regard to the necessity for the request by reference to the purpose for which it is sought and the requirements of the [Privacy Act 2020](#). Where it is determined that footage may appropriately be supplied to any party reasonable steps shall be taken to ensure that the footage is used solely for the authorised purpose and none other.
- d. All "Request to Review CCTV Footage" forms will be collated and retained in the Principal's office and shall be made available to the Woodford House Privacy Officer at any time.
- e. Woodford House shall provide access to, or copies of, video recordings to the NZ Police in connection with any ongoing criminal investigation only upon receipt of appropriate documentation (Production Order/Search Warrant or other documentation establishing that release is justified by reference to Privacy Principle 11).
- f. Woodford House may provide copies of video recordings to the NZ Police in connection with any investigation that requires a Police report.

7. Audit and Evaluation

- a. The Woodford House Principal, Privacy Officer or Primary CCTV Manager may audit any CCTV surveillance operations for policy compliance, including recording storage and retention.
- b. The Woodford House Privacy Officer will initiate a review of CCTV compliance with Privacy Principles and of the overall efficacy of CCTV operations at regular intervals, of no longer than 12 months each time.

PRIVACY

- a. Woodford House shall maintain the protection of individuals' privacy by:
 - i. ensuring information is collected for necessary and lawful purposes only
 - ii. taking reasonable steps to make individuals aware that information is being collected and the reason for such collection
 - iii. ensuring that information is collected in a fair manner
 - iv. requiring the appropriate storage and security of recorded information
 - v. ensuring information is used only for the purpose for which it was collected

- vi. complying with Principles 6, 9 and 11 of the Privacy Act relating to access to and retention and disclosure of information.
- b. The Woodford House Privacy Officer is authorised to oversee the use of CCTV recording for safety and security purposes at the School.

COMPLAINTS

- a. Complaints regarding any aspect of the operation of CCTV cameras by Woodford House including any complaint arising under this policy may be made to the Woodford House Privacy Officer/Principal. Complaints shall be dealt with under the Woodford House Complaints Policy.

This Policy will be reviewed as required or triennially.

Date Approved by Board of Proprietors: 21 July 2025

Date Approved by School Board: 1 September 2025

Next scheduled review: Term 3, 2028