



CCTV SECURITY SYSTEM POLICY



Closed Circuit Television (CCTV) Security System Policy

CCTV SECURITY SYSTEM POLICY

Document review and update: summary

Review date	Summary of changes	Approved by	Approve date
January 2021	Creation of the CCTV Security System Policy and associated Documents and Forms. As per clause 9.2, the Board will initiate a review of CCTV compliance with Privacy Principles of the Privacy Act 2020 and of the overall efficacy of CCTV operations no later than six months from the date of installation and recommend a timeframe for further review.	Board	29 Jan 2021
Mar 2022	The Board reviewed the policy in Mar 2022. In Clause 6.2, the word Board was replaced with the Centre Manager	Board	16 Mar 2022
May 2024	The Board reviewed the policy in April/May 2024 Clause 4.2 spelling of casual corrected, spelling of behaviour corrected, word potential inserted ahead of criminal offences, child protection policy added Clause 5.1 spelling of club corrected Clause 5.4 word possible replaced with practicable Clause 8.2 clarified to align with Privacy Commission's recommendations Clause 12 ESGC Feedback and Complaints Policy added Appendix 3 Request to review CCTV form amended to capture name and date of approval of request	Board	15 May 2024



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1. Purpose of the Policy

- 1.1. Eastern Suburbs Gymnastics Club (ESGC, the Club, us, we) has arranged for the installation of closed circuit television (CCTV) cameras inside the building of the Club.
- 1.2. This policy sets out the purpose for having a CCTV system and collecting data, and the management of the system including the monitoring of, storage and access to footage.
- 1.3. This policy is designed to protect the privacy of individuals and comply with the Club's legal obligations under the Privacy Act 2020. The policy aims to follow best privacy practice to ensure that any image captured, collected and stored are handled in a confidential manner that protects an individual's privacy at all times.
- 1.4. A Privacy Notice attached in [Appendix 1](#) will be available to the members on the ESGC's website.

2. Scope

- 2.1. This policy applies to the installation and use of ESGC-owned CCTV cameras installed inside of the ESGC's building.
- 2.2. All references to CCTV systems throughout this policy are to those systems which were designed and installed with the intent and ability to record video and/or to be monitored for the purposes of enhancing safety and physical security.
- 2.3. This policy applies to all Club's members, employees, casual staff, contractors, temporary staff, the Board members at ESGC, as well as visitors and general public who may enter the Club's premises.

3. Definitions

Principal CCTV Manager	The person designated by the Club's Board to have oversight of the provision and management of video security and CCTV systems in the Club, and to ensure compliance with this policy.
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.
Monitoring	The watching of CCTV images in real time.



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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.

4. Purpose of Monitoring Systems

- 4.1. CCTV monitoring and access to CCTV recordings governed by this policy is permitted primarily for the purpose of enhancing safety and security for all ESGC users and staff. Additionally live images may be displayed in the Club's main entrance/waiting room for the benefit of parents, caregivers and spectators. Recorded images may also be used to further coach development. This policy does not authorise use, interception, duplication, transmission or other diversion of video and CCTV technologies for any other purposes.
- 4.2. In this policy, safety and security purposes are those which involve:
- 4.2.1. The protection of individuals (including, but not limited to, members/gymnasts, employees, casual and temporary staff, and visitors).
 - 4.2.2. The protection of Club-owned property
 - 4.2.3. The deterrence of criminal behaviour and breaches of the ESGC's Code of Conduct or Child Protection Policy.
 - 4.2.4. The investigation of criminal behaviour, including the identification and apprehension of persons committing offences in the Club's building, and.
 - 4.2.5. The taking of action in relation to breaches of the ESGC's Code of Conduct where those breaches amount to potential criminal offences (but not otherwise).
- 4.3. In this policy, 'live images' involves providing live visual display to ESGC classes and programmes by means of a closed-circuit TV monitor system with live-streaming functionality.

5. Use and Operation of Monitoring Systems

- 5.1. CCTV monitoring and the use of video recordings will be conducted in a way that is consistent with this policy and other relevant Club policies, and in particular the Club's Coach Code of Conduct and ESGC's Child Protection Policy. The monitoring of images based on personal 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.
- 5.2. The use of CCTV cameras with audio recording capabilities is not permitted.

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- 5.3. Cameras may be recorded continuously (24 hours a day, seven days a week) or based on motion detection only and may also be monitored in real time in accordance with the provisions of this policy.
- 5.4. Only staff approved by the Principal CCTV Manager shall be permitted to have access to recorded footage. Approval for monitoring purposes shall be granted where such monitoring is relevant to the functions of the staff role. Access to recorded footage is governed by clause 8 below. Logs of all downloads must be automatically recorded within the hard-drive and as far as reasonably practicable shall be such as to enable identification of the person undertaking the download. Download logs shall be available for audit purposes to the Club's Board.
- 5.5. All staff granted approval to monitor the Club's 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 and security.
- 5.6. All approvals to download images must be recorded in writing and retained by the Principal CCTV Manager. All approved 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 the Club.
- 5.7. The Centre Manager has been designated by the Board to be the Principal CCTV Manager.

6. Installation and Configuration of Monitoring Systems

- 6.1. All requests for installation of CCTV cameras must be submitted to the Board.
- 6.2. The Centre Manager is required to retain records of all new video security components' locations, costs, camera descriptions, camera capabilities, makes and model numbers.
- 6.3. 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.
- 6.4. Installation of cameras with audio recording enabled is not permitted.
- 6.5. All IP cameras shall be installed and configured to a separate V-Lan or IP range so that they have no internet access. The camera server will be required to have internet access to allow for remote viewing and maintenance. Remote access across the ESGC internet connection shall be restricted to the camera server only via direct port forward to the server IP address only. Passwords for all CCTV devices shall be a minimum of 8 characters and include at least one of each of the following - upper case letter, lower case letter and either a numeral or special character.
- 6.6. Cameras must be located and 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, changing rooms and the office.

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6.7. Signage advising that cameras are in operation shall be installed at sufficient appropriate locations to ensure as far as reasonably possible that users of an area are aware that they may be subject to CCTV surveillance. The signage should say: "CCTV is operating in this area" or other similar wording approved by the Board and be of a size and style that makes the signage readily visible to people entering the area. See [Appendix 2](#) for the sample of the signage.

7. Records Retention

- 7.1. Recordings will be retained for a period of time that is subject to recording settings and storage capacity. As the hard drive/s reach capacity the recorded footage will be automatically overwritten. Downloaded recordings will be retained for so long as is reasonably required for purposes consistent with this policy.
- 7.2. Hard-drives containing recorded footage will be housed in a secure location with access by authorised personnel only.
- 7.3. Server operating system and software updates shall be applied appropriately to ensure the security and operational stability of the server".

8. Use of Recorded Information

- 8.1. The downloading and provision of recordings to others may be carried out only by the Principal CCTV Manager. Any downloading and provision of recordings shall be solely for a purpose recognised by this policy. A written record of that purpose, signed by the person authorising the downloading, shall be made before any downloading is undertaken.
- 8.2. Requests from members/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* footage form. Refer to [Appendix 3](#) for the form. Reasonable attempts will be made to protect the privacy of individuals in line with the requirements of the Privacy Act 2020.
- 8.3. The Principal CCTV Manager 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.
- 8.4. All *Request to review CCTV* footage forms will be collated and retained in the Club's Drive and shall be made available to the Board at any time.
- 8.5. The Club 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 of the Privacy Act 2020).



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9. Audit and Evaluation

- 9.1. The Board may audit any CCTV surveillance operations for policy compliance, including recording storage and retention.
- 9.2. The Board will initiate a review of CCTV compliance with Privacy Principles of the Privacy Act 2020 and of the overall efficacy of CCTV operations no later than six months from the date of installation and recommend a timeframe for further review.

10. Privacy

- 10.1. The Club shall maintain the protection of individuals' privacy by:
 - 10.1.1. Ensuring information is collected for necessary and lawful purposes only.
 - 10.1.2. Taking reasonable steps to make individuals aware that information is being collected and the reason for such collection.
 - 10.1.3. Ensuring that information is collected in a fair manner.
 - 10.1.4. Requiring the appropriate storage and security of recorded information.
 - 10.1.5. Ensuring information is used only for the purpose for which it was collected.
 - 10.1.6. Complying with Principles 6, 9 and 11 of the Privacy Act relating to access to and retention and disclosure of information.
- 10.2. The Board is authorised to oversee the use of CCTV monitoring for safety and security purposes at the Club.

11. Complaints

- 11.1. Complaints regarding any aspect of the operation of CCTV cameras by the Club including any complaint arising under this policy may be made to the Board. Complaints shall be handled as per the ESGC's Complaint Policy.
- 11.2. Nothing in 11.1 shall limit any person's right to pursue a complaint to the Privacy Commissioner.

12. Related Policies, Procedures and Forms

- 12.1. ESGC's Coach Code of Ethics.
- 12.2. ESGC's Child Protection Policy.
- 12.3. Privacy Act 2020.
- 12.4. Privacy Commissioner Guidelines – CCTV.
- 12.5. Official Information Act 1982.



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- 12.6. Crimes Act 1961.
- 12.7. ESGC's Feedback and Complaints Policy



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Appendix 1: Privacy Notice – example

CCTV Operation:

1. ESGC operates CCTV cameras in the Club. This means information about what you are doing in the Club will be collected and held by ESGC.

2. Purposes of CCTV operation.

The purpose of collecting information is to:

- Increase safety and security of individuals (including, but not limited to, members/gymnasts, employees, casual and temporary staff, and visitors).
- Protect of Club-owned property.
- Deter criminal behavior and breaches of the ESGC's Code of Conduct.
- Provide visual access to ESGC classes and programmes by means of a CCTV monitor system with live-streaming functionality.

3. Disclosure of Information Held.

The information collected are accessed by the ESGC's authorised staff only and used for the purposes in paragraph 2 above.

4. Access to CCTV.

Individuals identified on CCTV have the right to ask for access to footage about them and request that information be corrected. All requests will be dealt with under the Privacy Act 2020. Members and staff who want to view footage about themselves need to complete a *Request to review CCTV* form.

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Appendix 2: Signage – sample

CCTV is operating
in this area

The ESGC's CCTV Policy is available on
on requests at the office





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Appendix 3: Request to review CCTV form

ESGC uses Closed Circuit Television (CCTV) systems for the purposes of enhancing safety and physical security. The Privacy Act 2020 gives you the statutory right of access to the CCTV images we hold about you. Please complete this form if you wish to access a CCTV image. If you require assistance please contact the Centre Manager (details listed below).

Name of person making the request	
Contact Number	
Email	
Details of image to be viewed:	
Date/Estimated time	
Location	
Reason for request	
I acknowledge that the footage provided will only be used within the terms and purposes of the ESGC's CCTV System Policy and will not be published on the internet or given to media.	
Signed	Date

Please send this form to the Centre manager at centremanager@esgc.co.nz

On receipt of your completed form, we will respond to your request promptly, and in no more than 20 working days. If we encounter any difficulties in locating your image(s) we will keep you informed of our progress.

Request approved/actioned by (name)	
Signed	Date