



## **MAANGERE BRIDGE SCHOOL**

### **Privacy Impact Assessment (PIA) for CCTV Cameras in Schools**

The following is a detailed outline for a comprehensive Privacy Impact Assessment (PIA) for implementing CCTV cameras in schools.

#### **Introduction**

The Office of the Privacy Commissioner recommends that schools who are looking to install CCTV Cameras complete a Privacy Impact Assessment (PIA) for their school context. The purpose of conducting a Privacy Impact Assessment (PIA) for CCTV Cameras is to systematically evaluate the potential privacy risks and implications associated with the implementations of surveillance systems within the school.

#### **Purpose**

A PIA for CCTV Cameras helps identify and assess the privacy risks of data collection, use, or handling of personal information. A PIA will also propose ways to mitigate or minimise those risks. The Privacy Act 2020 governs how our school will collect, store, use and share information.

#### **Project Objectives**

The installation of the CCTV cameras in Mangere Bridge School is to discourage an increase of undesirable behaviour and help identify and resolve security issues. There are 7 Provision HD cameras of highly advanced technology installed and located in different areas of the school.

#### **Data Collection and Processing**

The types of data to be collected by the CCTV cameras will be video footage only for necessary and lawful purposes. The Principal will delegate this responsibility to the system administrator.

#### **Legal and Regulatory Compliance**

The school confirms that the CCTV system complies with the Privacy Act and laws in using and managing the system including data protection regulations according to our school CCTV Camera surveillance policy. The school will document any requirements for obtaining consent or providing notice to individuals.

### **Data Retention and Deletion**

The retention period for CCTV data will be no older than 7 weeks and this will be completed on a weekly basis. The procedure for securely disposing the data at the end of its retention period will be completed by the system administrator.

### **Access Control and Security**

The access controls in place restrict access to CCTV data to only authorised personnel that include the school's privacy officer who is the principal and the system administrator. A log book is used which details access to the system, the purpose and the operator. No data can be taken from the system unless approved in writing by the privacy officer. These security measures are implemented to protect the data from unauthorised access, disclosure or tampering. Police may request access when investigating criminal activity in the area and can be given access as required but must comply with the policy.

### **Transparency and Communication**

Students, parents, teachers and staff are informed about the presence of CCTV cameras, the purposes of their use, and their rights regarding their personal data. The policy explains how individuals can exercise their rights to access, rectify or erase their data. The requests for access from parents or other interested parties will be denied unless good cause is given and the board formally approves this access. Staff have the right to see footage of themselves as it is personal information held about them. They can only see it if it is readily retrievable so must supply a time, date and location. The privacy of other people who may be in the footage must be considered in this case. All data will be destroyed or stored in compliance with the approved standard on data protection. It is stored according to the standard so that it is not compromised and can be successfully used in court as evidence.

### **Impact on Individuals**

The school identifies the potential impact of the CCTV system on the privacy and rights of students, teachers and other individuals within the school community. There is signage in strategic places to inform people of the system and our reasons for it. The cameras are not installed in sensitive places and staff have been advised to continue with their normal business. The system is installed so that individuals committing a crime on school grounds or disturbing school programmes or individuals can be identified and prosecuted.

### **Accountability and Governance**

The responsibility has been assigned to the Principal and the System Manager for overseeing the CCTV system, ensuring compliance with privacy policies and responding to privacy-related inquiries or complaints. There are procedures for auditing and monitoring of the CCTV system.

## Risk Assessment

A detailed risk assessment is conducted by the school to identify and evaluate potential risks to privacy and security associated with the CCTV system. A risk mitigation plan to address identified risks is reflected in the school health and safety procedures.

## Review and Monitoring

The school will continue ongoing review and monitoring of the CCTV system to ensure continued compliance with privacy laws and regulations. The review will be scheduled regularly and any updates to the PIA to reflect changes in the system or the operating school environment.

## Conclusion

In conclusion, conducting a Privacy Impact Assessment for CCTV in our school is essential for promoting responsible and ethical use of surveillance technology, protecting individuals privacy rights, and fostering a culture of privacy and data protection within the educational environment. By following the comprehensive PIA framework, MBS can systematically assess the privacy of implementing CCTV cameras and take steps to protect the privacy and rights of individuals within the school community.

