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LGOIMA

When releasing responses to previous LGOIMA requests, names and contact details of individual requestors will be withheld to protect their privacy.

Information requested by the media, lobby groups, public sector organisations and MPs will always be published, while information specific to an individual or their property will not generally be published.

Request from:	Farah Hancock – Radio New Zealand
Information requested:	CCTV information
Response by:	Simon Bastion, Chief Executive

25 January 2022

Farah Hancock
Data and Long Form journalist
RNZ

Via Email: farah.hancock@rnz.co.nz

Dear Farah

Official information request for CCTV information

I refer to your official information request dated 30 December 2021 for CCTV information.

You have asked for the following information:

- 1. How much has been spent on the installation of CCTV cameras in the past five years, broken down by year?**

\$0 – no external CCTV has been installed in the last 5 years.

- 2. What is the cost to run CCTV cameras of a 12 month period?**

\$0 – no running costs.

- 3. Were any outdoor cameras vandalised in 2021?**

No, none were vandalised.

- 4. If outdoor cameras were installed for crime prevention, security or public safety, can you please include the number of reported crimes in the year prior to camera installation and the number of reported crimes in in 2021?**

The external camera was not installed for crime prevention, security or public safety.

- 5. Can you please list the number of times camera footage was used in solving a crime in 2021?**

None.

- 6. Does your organisation regularly review whether CCTV cameras are performing their objective?**

No, not at this moment in time.

- 7. Does your organisation have any policy regarding CCTV in place, which covers any of the following – If so, please provide a copy or link to it:**

- a. Objectives of cameras**

- b. Data protection**

- c. Sharing of footage**

Please see enclosed Use of CCTV Policy.

8. Vetting of volunteers viewing footage?

Please see enclosed Use of CCTV Policy.

There is no charge in supplying this information to you.

Council has adopted a Proactive Release Policy and accordingly may publish LGOIMA responses on the Council Website at <https://www.westlanddc.govt.nz/lgoima-responses>. The collection and use of personal information by the Westland District Council is regulated by the Privacy Act 2020. Westland District Council's Privacy Statement is available on our website [here](#)

If you wish to discuss this decision with us, please feel free to contact Mary-anne Bell, Senior Administration Officer at LGOIMA@westlanddc.govt.nz, 03 756 9091.

Sincerely,

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Simon Bastion | Chief Executive

SB/MB

Use of CCTV – Addendum to Data Privacy Policy

1. Purpose

To inform Council employees and customers that CCTV is installed in Council property, and worn as body cameras by Council employees, the purpose of recording footage, the conditions dictating when footage can be viewed and the method of storage of the footage.

1.1 Scope

This policy applies to the installation and use of Council owned CCTV cameras in premises used for Council business and body camera's worn by employees during site visits.

1.2 Commencement

This addendum to the Data Privacy Policy comes into force on 1st October 2021.

1.3 Definitions

Principal CCTV Administrator	The person designated by the Chief-Executive Officer to have oversight of the provision and management of video security and CCTV systems across the Council, and to ensure compliance with this policy. In this case, the Council Information Technology Manager.
CCTV Manager	Person(s) approved by the CEO to manage the provision of video security and CCTV systems at specific sites or for specific teams.
Privacy Officer	The staff member(s) delegated as Privacy Officer in the Staff Delegation manual.
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.
CCTV	Closed circuit television used to transmit a signal to a specific place(s). Also covers portable "Body Cameras" as issued to Regulatory Services Staff.

2. Policy

2.1 Purpose of Monitoring Systems

- a) CCTV monitoring and access to CCTV recordings 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, employees and visitors).
 - ii. the protection of Council-owned and/or operated property, buildings and critical infrastructure.
 - iii. the deterrence of criminal behaviour.
 - iv. the investigation of criminal behaviour including the identification and apprehension of persons committing offences on or around the premises, and while employees are conducting business off-site.
- c) If in the event of viewing CCTV for the specified purpose, images are observed that warrant disciplinary action, the CCTV can be used for the purpose of a disciplinary investigation. However, CCTV will not be viewed solely for the purpose of monitoring staff.

2.2 Protocol for the Use and Operation of Monitoring Systems

- a) CCTV monitoring and the use of video recordings will be conducted in a way that is consistent with the Privacy Policy and other relevant Council policies. The monitoring 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) Cameras may record 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.
- c) Only staff approved by the Principal CCTV Administrator shall be permitted to monitor CCTV images and/or to have access to recorded footage. Approval for monitoring purposes shall be granted where such monitoring is relevant to the functions of the staff member's role. Access to recorded footage is governed by clause 2.5 below.
- d) All staff granted approval to monitor Council CCTV systems must receive appropriate training in the technical, legal, and ethical parameters of appropriate camera use.

2.3 Installation and Configuration of Monitoring Systems

- a) All requests for installation of CCTV cameras must be submitted to the Executive Team and require approval of the CEO and Privacy Officer.
- b) The Principal CCTV Administrator 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 relevant Council Codes of Practice.
- d) IP video used for security purposes pursuant to 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).
- e) 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, dressing rooms, locker rooms and private dwellings (including views through windows and rear gardens).
- f) 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: "Crime Prevention Cameras Operating at all times in this Area" or other similar wording approved by the Privacy Officer.

2.4 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 & WDC's Retention and Disposal 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.

2.5 Use of Recorded Information

- a) The viewing, downloading and provision of recordings to others may be carried out only by a 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 (using the Request to Review CCTV Footage Form) shall be made before any downloading is undertaken.

- b) Requests from the public or 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 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.
- c) All "Request to Review CCTV Footage" forms will be collated and retained in the EDRMS system and shall be made available to the Privacy Officer at any time.

2.6 Audit and Evaluation

- a) The Privacy Officer or Principal CCTV Administrator may audit any Department's CCTV surveillance operations for policy compliance, including recording storage and retention.
- b) The Privacy Officer will initiate a review of CCTV compliance with Privacy Principles 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.

2.7 Privacy

The Council shall maintain the protection of individuals' privacy by:

- a) Ensuring information is collected for necessary and lawful purposes only.
- b) Taking reasonable steps to make individuals aware that information is being collected and the reason for such collection.
- c) Ensuring that information is collected in a fair manner.
- d) Requiring the appropriate storage and security of recorded information.
- e) Ensuring information is used only for the purpose for which it was collected.
- f) Complying with Principles 6, 9 and 11 of the Privacy Act relating to access to and retention and disclosure of information.

The Privacy Officer is authorised to oversee the use of CCTV monitoring for safety and security purposes.

2.8 Complaints

- a) Complaints regarding any aspect of the operation of CCTV cameras by the Council including any complaint arising under this policy can be made to the Privacy Officer. Complaints will be investigated through such process as the Privacy Officer is satisfied provides the complainant a full and fair opportunity to advance their concerns while having matters determined in a timely manner.
- b) Nothing in 2.8(a) shall limit any person's right to pursue a complaint under the Ethical Behaviour Policy or to the Privacy Commissioner.

3. Related Documents and Acts

The following Legislation relates to this policy:

[Privacy Act 2020](#)

[Official Information Act 1982](#)

[Crimes Act 1961](#)

[Privacy Commissioner Guidelines – CCTV](#)

Note: Any legislation referred to should be interpreted as meaning the Act and its amendments

Use of CCTV – Addendum to Data Privacy Policy



Staff are also referred to:

[Request to Review CCTV form](#)

[Standard Operating Procedure – CCTV Requests](#)

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