



NZSTA
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Governance support resources

Privacy, policy and CCTV use in schools

Security cameras or closed-circuit television (CCTV) are commonly installed both in school grounds and classrooms to address issues such as vandalism and individual safety. Here are some considerations for the board when introducing CCTV (or reviewing) what is in place.

Questions for the board

When the board is looking at introducing the technology, considerations include:

- why does the school want to use this technology?
- will this technology address identified problems?
- how will the system be operated?
- initial and ongoing costs
- privacy impact assessment – is there one?
- board policy and school procedures.
- community consultation: about introducing the technology / ongoing
- does the board need technical and legal advice to make informed decisions?

Privacy Act 2020

The Privacy Act 2020 introduces greater responsibilities and risks for boards. There are 13 information privacy principles in the Act.

Privacy considerations for the board include:

- what information will be collected and why?
- how will staff, students and visitors to the school know the information is being collected?
- what safeguards are needed to ensure only information from within school grounds will be collected?
- once collected, will the information be secure?
- who will have access to the information?
- how long will the information be stored?
- how will the board and school ensure the information is only used for the purpose for which it was collected, unless one of the exceptions applies, e.g. possible criminal activity is identified?

Board policy

Board policy about the school's use of security cameras should include the board's expectations. The principal then applies those expectations when developing the board's procedures.

Note: this policy meets the criteria for a by-law. Boards must consult with their school community when making or reviewing the policy. This would include staff, students, their families and whānau, and the Māori community.

Policy expectations include:

- clearly visible notices about the presence of cameras. (The procedure could then set out where the cameras are to be placed e.g. in classrooms, public areas and in the grounds, as decided by the principal)
- regular communications to the school and school community about:
 - why the information is being collected. (The procedure could then set out the reasons, e.g. to ensure safe teaching practice, and identify student bullying behaviour and vandalism)
 - confirmation that the information collected can only be used for those stated purposes
 - who will see the information. (The procedure could specify which authorised staff can view the information)
 - how the information is stored and how long the information is kept. It should not be kept for longer than it needs to be, in terms of the reason it was originally collected.
 - the communication could also say when the information might be shared with others e.g. with police, if possible criminal activity is identified
- regular consultation requirements with the school community when developing and reviewing this policy
- review following incidents

NZSTA governance framework 2018

NZSTA Governance framework 2018 is a set of sample policies that boards are free to download, use and adapt to their board's own style of governance. The framework does not currently include a Privacy policy. Policy *D1 Responsibilities of the principal policy* includes expectations relating to the Privacy Act 2020. Boards using D1 are free to amend it to include provisions about the school's use of CCTV.

Boards whose governance framework does not currently use any of the sample policies in the NZSTA governance framework 2018 are also free to use the Governance framework's policy format when developing or reviewing any policy. All policies in parts B – D of the framework include an outcome statement, scoping, delegations, expectations and limitations, procedures and supporting documentation (for which the principal is responsible). The policies in Part D are operational, in that they outline board expectations for the control and management of the school. They also provide for monitoring, review and legislative compliance.

Boards are welcome to contact NZSTA Advisory and Support Centre for advice, including comment on existing or draft policy.

Resources

[Ministry of Education](#) – information on security design in schools

[Privacy Commissioner](#) website - information about privacy and CCTV, including policy considerations

[NZSTA](#) website - NZSTA Governance Framework 2018

[NZSTA](#) Knowledge Hub – modules on privacy and related topics

Education and Training Act 2020, [section 126](#)



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For further advice please contact the **Advisory and Support Centre** on **0800 782 435, option 1** or govadvice@nzsta.org.nz