

## Security – Closed Circuit Television (CCTV) System

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Document Type	Policy
Risk of non-compliance	may result in a small degree of harm to the patient/DHB
Function	Administration, Management and Governance
User Group(s)	Auckland DHB only
<ul style="list-style-type: none"> <li>• Organisation(s)</li> </ul>	Auckland District Health Board
<ul style="list-style-type: none"> <li>• Directorate(s)</li> </ul>	All directorates and tenants located within Auckland DHB occupied buildings
<ul style="list-style-type: none"> <li>• Department(s)</li> </ul>	All departments and tenants located within Auckland DHB occupied buildings
<ul style="list-style-type: none"> <li>• Used for which patients?</li> </ul>	All patients, general public
<ul style="list-style-type: none"> <li>• Used by which staff?</li> </ul>	All staff and contractors including external contractors and volunteers
<ul style="list-style-type: none"> <li>• Excluded</li> </ul>	Trust buildings on main campus’ with externally managed CCTV systems
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<ul style="list-style-type: none"> <li>• Owner</li> </ul>	Chief Executive
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## 1. Purpose of policy

The overall purpose of this policy is to ensure the Auckland District Health Board (Auckland DHB) operates and manages its Security Closed Circuit Television (CCTV) system lawfully, effectively and in a socially responsible and ethical manner.

The Auckland DHB's CCTV System is one tool in a suite of security arrangements required for everyone's safety and security on Auckland DHB sites. When used in accordance with this policy, the Security CCTV System supports and demonstrates the Auckland DHBs values.

This policy also:

- Allows the Auckland DHB and its security services partners (see [Definitions](#) for example of security service partners) to demonstrate that thoughtful and appropriate governance mechanisms are in place for the CCTV System and associated processes;
- Gives authority to the Auckland DHB Closed Circuit Television (CCTV) Standards and Guidelines (see [Associated documents](#)), and CCTV related Standard Operating Procedures (SOPs) for consistency with the policy.

## 2. Background

The Auckland DHB operates numerous CCTV cameras throughout the majority of its sites. The CCTV System has recently been expanded and upgraded (2017) in accordance with a new integrated 'Security for Safety Programme' (refer to <https://adhb.hanz.health.nz/Pages/Security-for-Safety.aspx>). The upgrade included replacing analogue with digital CCTV cameras, more cameras and a new video management system.

The Security for Safety Programme and the Auckland DHB's improvement initiatives, along with the wish to protect the interests of workers, patients and the public, were the drivers for developing a comprehensive CCTV policy with all supporting governance, standards, guidelines, procedures and resources, such as are required to operate the CCTV System in a lawful, ethical and efficient manner.

## 3. Definitions

Term	Definition
<b>CCTV System</b>	All aspects of the CCTV System used by, for, or on behalf of the Auckland DHB for the aforementioned security purposes - including the design, installation, operation and management of any hardware, equipment, software, cabling, associated information technology (IT) and communications, control and monitoring centre and any information created by the system.
<b>CCTV System Information</b>	Any video images or associated data generated, logged, processed, stored on, retrievable from or produced from the CCTV System.
<b>Covert CCTV camera</b>	Refers to a CCTV video camera that is not visible and which people do not know it exists.

<b>Term</b>	<b>Definition</b>
<b>Footage</b>	Any video data acquired from a CCTV camera, be that a single image, or sequence of frames.
<b>Guidelines</b>	The recommended means by which official standards should be achieved, which are linked to the requirements of the Privacy Act.
<b>CCTV operators</b>	Security personnel including for example the Head of Security Services, Security Operations Manager, Security Services Coordinator, and Security Control Room Team Leader and other Healthcare Security Officers and other Healthcare Security workers who are authorised to operate the CCTV System.
<b>Incident</b>	An event where there is a credible prospect of, or there has been a breach of Security, or threat of harm.
<b>Standard Operating Procedures (SOP)</b>	Local standard operating procedures which are the documented processes to be followed in association with using and managing the CCTV System, and security incident interventions.
<b>Property</b>	Buildings, plant, equipment and other Auckland DHB property including vehicles, revenue, information, chattels, and such directly associated with DHB operations.
<b>Resources (security)</b>	Templates, pro-formas, plans, specifications and the like associated with the CCTV System.
<b>Security</b>	Protective arrangements intended to provide safety from harm; and prevent property crime.
<b>Security partners</b>	Police. Manpower security services. Any contractors associated with the design installation, commissioning, maintenance and support of the CCTV System.
<b>Security safety</b>	Freedom from real and perceived harm.
<b>Standards</b>	Mandatory performance requirements associated with any aspect of the CCTV System that must be met which are linked to the requirements of the Privacy Act.
<b>The public</b>	Members of the public using the Auckland DHB's facilities.
<b>Worker</b>	'Worker' refers to all employees, Auckland DHB contractors, external contractors, and members of partner organisations working on Auckland DHB premises including students and volunteers.

#### 4. Purpose of CCTV system

The purpose of the CCTV System, as required to be stated under the Privacy Act, is to:

- Enhance people's perceptions and expectations of security safety and security.
- Protect front line workers in potentially risky situations.
- Detect and/or deter circumstances that place the security safety of people and the security of assets at risk from security threats.
- Initiate early intervention for circumstances that place people and property at risk.

- Assist in the safest and most efficient management of emergency responses such as, but not limited to, Code Black, Code Orange, and Code Red and associated lockdown procedures.
- Assist workers to manage authorised access to access controlled areas.
- Investigate alarm conditions alerted on the security management system, including duress alarms and access security breaches.
- Investigate security and safety incidents with reference to stored CCTV system information for remedial purposes.
- Allow the security team to conduct virtual guard tours much more often, more quickly and efficiently, and when workers have priority deployments elsewhere, than when they are done in person.
- Monitor pedestrian and vehicular movement, car park capacities and the like, for assisting users.
- Be operated as a refined motion detector when conventional intrusion detectors are impractical.

## 5. Policy statements

1. The Auckland DHB supports the use of a CCTV system for the purposes of fulfilling its security safety and security commitments and obligations.
2. Any CCTV System that the Auckland DHB own, operate or use in any way, by us, or on our behalf must be in accordance with lawful, responsible and ethical practices.
3. The Auckland DHB will:
  - Use the CCTV System to help us meet our obligations, and wishes to protect people from security and safety risks and property from crime.
  - Have appropriate governance mechanisms in place for the CCTV System to be operated and managed lawfully, effectively and in a socially responsible and ethical manner.
  - Support our policy with standards, guidelines and standard operating procedures to ensure that lawful, responsible, ethical and auditable practices are followed.
  - Use CCTV to increase efficiency and to reduce all costs associated with crime prevention.
  - Audit CCTV use and associated processes located on Auckland DHB premises by external contractors, to ensure compliance with this policy and associated standards and guidelines.
4. This policy covers any and all elements of the Auckland DHBs CCTV System installed in any location occupied by the Auckland DHB.
5. The placement of the CCTV System must not unreasonably intrude on the privacy of individuals. Cameras may be blinkered and adjusted as required to prevent parts of their field of view from being 'seen' and recorded where there are potential privacy implications.
6. The Auckland DHB will not use overt or covert CCTV recordings in any areas where persons would reasonably expect to have privacy, such as showers, toilets and dressing rooms.
7. CCTV cameras will operate at all times 24-hours a day, seven days a week.
8. Cameras in some areas may record footage 24-hours a day, seven days a week and in all other areas, CCTV cameras will only record when there is activity within their programmed field of view.
9. Any person who uses or interacts with the CCTV System in any way must do so:
  - Solely for the purposes under [Section 4: Purpose of CCTV System](#)
  - In accordance with this policy; and

- In accordance with all mandatory standards, guidelines, procedures and other supporting material associated with this policy, as is applicable to their use or interaction with the system.
10. The Auckland DHB will not use the CCTV System for any purpose other than those stated in [Section 4](#).
  11. Any person who, despite the controls put in place through this policy and associates associated supporting documents misuses the CCTV System:
    - Is liable to discovery of such breaches from Auckland DHB audits; conducted as per Guideline 9.4 of the Privacy and CCTV Guide (New Zealand (NZ) Privacy Commissioner, 2009). In-built CCTV System audit trails and other checks built into the Auckland DHB Standards and Guidelines and SOPs (to be) developed in support of this policy.
    - Will be investigated for breach of this policy, and mandatory employee or contractor confidentiality obligations.
    - May be subject to associated sanctions managed by Human Resources (HR).
  12. CCTV operators in the control room will monitor CCTV System images in real time or from stored archives for the purposes set out in [Section 4](#). Only the operator on duty or others with an immediate operational need are permitted to view images from the CCTV System. The control room (CCTV Image Receiving Centre) must be securely locked, at all times to prevent images being seen that have no need to be seen by others.
  13. CCTV monitors may be on display in public areas showing coverage of those areas. The purpose of this is to provide an additional level of security by demonstrating full and effective operation.
  14. CCTV operators must maintain a record of all incidents viewed on CCTV that require a response in the Control Room Log. All images will be time logged in the system along with identification of the operator.
  15. Clear signage regarding the use of CCTV cameras must be provided in accordance with the recommendations of the Office of the Privacy Commissioner.
  16. As a part of the Auckland DHB's process improvement programme, and as recommended under 'Guideline 9' of the Privacy and CCTV Guide (Privacy Commissioner, 2009), the operation and management of any CCTV System covered by this policy shall be subject to regular audit for compliance with the CCTV Policy and confirmation of its purpose.

## 6. Covert CCTV

1. The use of covert CCTV is likely to be considered a 'search' for the purposes of the New Zealand Bill of Rights Act 1990 (BoRA), to which the Auckland DHB is subject. Under the BoRA, everyone has the right to be secure against unreasonable searches. Consequently, any 'search' by covert CCTV would need to be both lawful and reasonable.
2. Covert CCTV will only be used:
  - In support of the Auckland DHB fulfilling its safety and security commitments and obligations, and
  - Where there is a very compelling security or safety interest that necessitates its use; for example to gather evidence of some conduct that threatens that security or safety interest that could not be obtained if the person was aware of the presence of CCTV cameras, and
  - Where all other measures have been considered and deemed inadequate.

3. Only authorised covert CCTV cameras installed by – or on behalf of – the Auckland DHB are permitted on Auckland DHB sites, and must be integrated with the CCTV System. If an unauthorised Covert CCTV camera is discovered, the unit will be removed immediately, an investigation carried out, and disciplinary actions may be taken.
4. Covert CCTV camera requests that meet requirements (noted in points 1-3 above) for Authorisation of Covert CCTV cameras, must be made in writing via email to Auckland DHB Security Services Coordinator. The Security Services Coordinator will forward relevant and appropriate requests to the Auckland DHB Privacy Officer for final review and approval. The Privacy Officer will review the application with the Auckland DHB Legal Counsel, before a final decision is made. If approved, conditions of operation in addition to those required for overt CCTV will be specified; for example, how long the camera may operate, who may complete installation (and removal), who may access the CCTV System information recorded by Covert CCTV cameras.

## 7. Provision of CCTV system information

1. The provision of CCTV system information may be considered in regards to:
  - A request for information based on CCTV system information. For example, whether there is footage of someone committing a particular crime, or
  - A request to view or receive a copy of CCTV system information, or
  - Access to CCTV system information before a request has been made.
2. Details - including the date, description, status, approver(s) and outcome - of all CCTV system information provision must be logged in the CCTV Request Log.
3. Regarding requests for information based on CCTV system information, and requests to view or receive a copy of CCTV system information:
  - 3.1. All requests must be submitted in writing, using the CCTV footage request form which can be found on the Security Services intranet page (Hippo).
  - 3.2. All requests must be considered in regards to the purposes of CCTV as stated in this policy;
  - 3.3. All requests will be responded to within five working days;
  - 3.4. Requests for information based on CCTV system information must be made to the Security Services Coordinator. This worker is responsible for approving or declining the request and for delegating the appropriate worker(s) to fulfil approved requests;
  - 3.5. Requests to view or receive a copy of CCTV system information must be made in writing (using the Auckland DHB 'Provision of CCTV information' form) to the Security Services Coordinator. This worker is responsible for approving or declining the request, and for referring the request for authorisation by:
    - The relevant Auckland DHB Directorate General Manager or Directorate Director, and
    - The Head of Security Services, and
    - The Chief People Officer, and
    - The Auckland DHB Privacy Officer.
  - 3.6. If a request to view or receive a copy of CCTV system information is unable to be granted without unreasonably breaching others' privacy, a written description may be provided of the actions under enquiry in the footage.
4. Regarding the provision of CCTV system information before a request has been made:

- 4.1. Any worker incidents or misconduct detected by the CCTV Operators will be reported to their Manager and Human Resources (HR) for actions and to be handled in accordance with the Auckland DHB, Discipline and Dismissal Policy (see [Associated documents](#)).
- 4.2. Any criminal activity detected by means of the CCTV System shall be forwarded to the Police for investigation.
- 4.3. When CCTV system information is being provided before a request has been made, the same approval requirements apply as in section [7.3.4](#).
5. Evidence locks must be applied so the Auckland DHB can retain a record of all CCTV system information provision. Evidence locks will only be removed as necessary when no-longer required.

## 8. Storage and retention of CCTV system information

Access to the CCTV System area is strictly controlled. Access to the CCTV System recording equipment is monitored by a CCTV camera.

CCTV system information will be stored at the Auckland DHB data centre.

Authorised workers and approved security systems contractors will select and place the CCTV equipment to meet the purposes stated in [Section 4](#) only.

The quality of recorded images is to be checked regularly to ensure no unreasonable loss of functionality. Servicing of equipment and checking recording quality will be attended to on a daily basis and as required.

Recorded CCTV footage must be stored in a secure environment.

A portion of the footage is to be retained for evidential purposes when an incident or suspected incident has been identified. Retention is subject to the approval of the Auckland DHB Security Manager, the Human Resources Manager, and the Auckland DHB Privacy Officer.

All recorded CCTV footage must be retained for minimum of 30 days before being overwritten. The exception to this is 'evidence locked' footage which is stored until the purpose it was locked for is resolved.

## 9. CCTV signage

- Signage in accordance with the recommendations of the NZ Office of the Privacy Commissioner, must be erected in all Auckland DHB sites where CCTV cameras are installed.
- Signage must be readily visible and installed where necessary to notify people before they enter any area covered by CCTV cameras, including public entrances to the site and buildings.
- The signage will also give contact information for any queries regarding the CCTV System.
- The signs will make clear who owns and operates the CCTV system and the contact details of that agency.

- A full privacy notice to let people know more about the operation of CCTV at Auckland DHB is available on the Security Services intranet page, and in hard copy on request from the Security Office.
- The following signage will be displayed at the Auckland DHB:



## 10. Privacy

CCTV systems in places which are accessible to the public trigger legal and ethical considerations that need to be taken into account. Privacy concerns are around the use of CCTV cameras in real time, plus the use, access, disclosure, storage and retention of collected video images.

## 11. Complaints

Anyone who believes information about them has been obtained through CCTV, may apply to the Head of Security Services, relevant HR Manager or the Privacy Officer for access to that information.

If access is refused or not fully granted, the individual concerned may make a complaint via the established Auckland DHB complaints process (see <https://adhb.hanz.health.nz/Pages/Consumer-complaints.aspx>) or refer the request to the Privacy Commissioner for investigation.

## 12. Legislation

The Auckland DHB wishes to comply with the legislation applicable to the operation and management of its CCTV System, principally the Privacy Act 1993, which safeguards the privacy of

individuals. The Office of the Privacy Commissioner has provided an interpretation of the Privacy Act for the purposes of CCTV, in its Privacy and CCTV Guide 2009.

The following are other legislation and mandates relevant to the operation and management of the CCTV System.

- Crimes (Intimate Covert Filming) Act 2006
- Health Information Privacy Code 2020
- Health and Safety at Work Act 2015
- Human Rights Act 1993 (s.42)
- New Zealand Bill of Rights Act 1990
- Official Information Act 1982
- Privacy Act 2020
- Private Security Personnel and Private Investigators Act 2010
- Public Records Act 2005
- Health and Disability Consumer (Code of Health and Disability Services Consumer Rights Regulations 1996)  
Legislation

### 13. Supporting evidence

- Office of the Privacy Commissioner. (2009). Privacy and CCTV: A guide to the Privacy Act for businesses, agencies and organisations. <https://privacy.org.nz/publications/guidance-resources/privacy-and-cctv-a-guide-to-the-privacy-act-for-businesses-agencies-and-organisations>

### 14. Associated documents

Code Black Policy  
Code Orange Policy  
Consumer Complaint Management  
Discipline and Dismissal  
Security (Physical) Policy

#### **Other**

Closed Circuit Television (CCTV) Standards and Guidelines  
(available from: <https://adhb.hanz.health.nz>)

#### **Forms**

CCTV installation request form  
CCTV footage request (Provision of Security CCTV information)  
(available from: <https://adhb.hanz.health.nz/Pages/Security-Services.aspx#CCTV>)

## 15. Disclaimer

No guideline can cover all variations required for specific circumstances. It is the responsibility of the health care practitioners using this Auckland DHB guideline to adapt it for safe use within their own institution, recognise the need for specialist help, and call for it without delay, when an individual patient falls outside of the boundaries of this guideline.

## 16. Corrections and amendments

The next scheduled review of this document is as per the document classification table (page 1). However, if the reader notices any errors or believes that the document should be reviewed **before** the scheduled date, they should contact the owner or [Document Control](#) without delay.