

## **CCTV/Surveillance Policy**

Closed Circuit Television (CCTV) refers to camera surveillance devices that capture images of people and activity, and includes other surveillance devices of the same or similar nature.

### **Surveillance by Napier District Masonic Trust (NDMT)**

CCTV is operated by the trust and is used throughout our villages to:

- help ensure the safety and security of our residents, staff, contractors, visitors and property;
- detect and deter criminal behaviour; and
- investigate and manage complaints, misconduct and challenging behaviour.

Any footage collected will be used solely for these purposes or as required or permitted by law.

Footage that sufficiently identifies individuals which is collected via CCTV is considered personal information and is therefore subject to the Privacy Act 2020 (the Privacy Act).

CCTV operates 24 hours a day, seven days a week. Footage of events and the movements of people will be captured. The trust does not use any facial recognition technology or other 'intelligent surveillance' technology.

CCTV cameras are located throughout our villages but are not installed in bathrooms or other personal areas, including resident's rooms.

Footage will not be linked to or accessible via any person's file or records, except as set out below.

Footage collected via CCTV will be kept securely for up to 90 days. Stored footage can only be accessed by authorised trust managers and staff. It will only be reviewed if required to investigate an incident/complaint, if a security problem is identified or as otherwise required or permitted by law. It will only be retained for longer than 90 days if needed for evidential purposes and, with the approval of the Privacy Officer, may be stored in the investigation file.

Covert surveillance devices may be used in exceptional circumstances; where management has strong grounds to suspect that theft or misconduct is occurring. In these circumstances a surveillance device may be installed and used without the knowledge of employees. Approval from the CEO is required before a covert surveillance device may be installed. Consent will always be obtained from residents and their families before covert surveillance devices are used in residents' rooms.

If any criminal behaviour is recorded via CCTV, the footage may be provided to the Police.

## Surveillance by third parties

Surveillance devices (either visual or audio) installed and operated by a third party without NDMT's knowledge and consent are prohibited in NDMT villages in any areas where the devices may:

- surveil or record NDMT staff without their knowledge or consent;
- surveil or record residents (or anyone else) without their knowledge or consent in such a way that is intrusive or breaches their privacy.

NDMT has the right to immediately disconnect any such devices, and ask that they be removed effective immediately, in reliance on the following grounds:

1. clauses 2.3, 2.9 and 2.10 of NDMT standard-form resident occupation agreement used in the trusts villages;
2. a breach of the information privacy principles under the Privacy Act, and provisions in the Privacy Act requiring NDMT to protect the privacy of its employees and safeguard personal information collected about them;
3. offences within the Crimes Act 1961 relating to the interception of private communications and intentionally making intimate visual recordings of another person;
4. protections afforded to residents under the Protection of Personal and Property Rights Act 1988; and
5. the age related resident care (ARRC) agreements between NDMT and the DHBs, which require the trust to protect the dignity and privacy of residents.

## Questions/complaints

If you have any questions or complaints about the use of CCTV or other surveillance devices within Ryman's villages or construction sites, please contact NDMT's Privacy Officer.

## WHO TO CONTACT

If you have any queries or concerns about privacy or your personal information or have a complaint about the way we have treated your personal information, please contact us and we will respond as soon as possible to resolve the issue. We also welcome any questions and comments you may have about our privacy practices.

You can contact us at:

Privacy Officer  
Napier District Masonic Trust  
PO Box 7288  
Taradale  
Napier 4141

Email: [privacy@ndmt.co.nz](mailto:privacy@ndmt.co.nz)

Phone: 06-8459220

If you for any reason you are not satisfied with our response you can contact the [Office of the Privacy Commissioner](#).