

Marymount Primary School Close Circuit Television (CCTV) Policy

Aims

This policy seeks to establish guidelines that allow reasonable monitoring of the school equipment and interactions as safety considerations without intrusion into the privacy of individuals. The closed-circuit television (CCTV) surveillance system is set up according to the requirements under the Personal Data (Privacy) Ordinance (Cap. 486) (the "Ordinance") relating to the collection of personal data.

Location of CCTV Cameras

1. CCTV cameras are positioned in a way that will not unnecessarily intrude into privacy of individuals.
2. A Camera Location Plan will be made available to all staff, students and visitors upon request. Conspicuous notices will be placed at the entrance to and inside the monitored areas so that anyone using those areas is aware of the surveillance.
3. Public area video monitoring will be conducted only in areas where the public does not have a reasonable expectation of privacy. Cameras will not, under any circumstances, be located in private locations, such as toilets or changing rooms.

Purposes of CCTV Surveillance

1. The CCTV surveillance system is set up for the following purposes:
 - to enhance personal safety of individuals on school premises;
 - to deter inappropriate behavior on school premises;
 - to investigate alleged or suspected incidents of said inappropriate behavior; and
 - to protect school property.
2. The CCTV surveillance system will NOT be used for the following purposes:
 - Monitoring staff or student work performance; and
 - Monitoring public places from within the school premises.

Kinds of Personal Data Held

The CCTV cameras only record images, no sounds are recorded.

Handling of the Recorded Images

1. According to the Data Protection Principles (DPP) of the Ordinance, a duty on data users is imposed to ensure data accuracy and that there is no excessive retention of personal data. Thus, all recorded images collected will be routinely deleted within one month. The school reserves the right to retain the said images for a longer period of time under the following circumstances:
 - Where the recorded images reveal an incident of wrongdoing or seriously improper conduct and the school seeks to use the information to make a decision that directly affects a staff or student; and
 - Where the recorded images are required as evidence in legal or disciplinary proceedings.
2. The recorded images and records are saved and protected against unauthorized or accidental access, processing, erasure or other use. The access to places where the images are recorded by the CCTV cameras are viewed, stored and handled are secured and restricted to authorized persons (Principal and Vice Principals) only. Only authorized persons have the right to access contents recorded by the CCTV cameras where it is necessary for the purposes for which this policy seeks to fulfill.
3. When the School is requested to provide copies of CCTV records to a law enforcement agency (e.g. Police) for criminal investigation purpose, the provisions of section 58 of the Ordinance may apply and the School may disclose the CCTV records to third parties.

All enquiries in relation to this policy shall be directed to the said authorized persons.

References:

1. "Guidance on CCTV Surveillance and Use of Drones" – Office of the Privacy Commissioner for Personal Data, Hong Kong, March 2017
2. "Privacy Guidelines: Monitoring and Personal Data Privacy at Work" – Office of the Privacy Commissioner for Personal Data, Hong Kong, April 2016
3. Personal Data (Privacy) Ordinance (Cap. 486)