

Closed Circuit Television (CCTV) Policy

Introduction

Closed circuit television cameras are in place on many of our buses and premises to help provide a safe and secure environment for employees, passengers and visitors to our depots and sites.

The purpose of public transport CCTV systems is to contribute to a public transport network where passengers, employees and the general public feel safe. Surveillance technology allows for visual and audio recording and is a contractual requirement for some routes and services.

Additionally, it provides a number of benefits for passengers and employees:

- It allows the capture of information that could be used to investigate crime, a health and safety matter
- It can assist investigation into employee or passenger incidents and/or misconduct.
- It contributes to improved deterrence of criminal activity
- CCTV footage can be of assistance in training employees on customer service and conflict management.
- Other purposes as provided for in the Privacy Act 2020.

We have safeguards to prevent unauthorised access to, or misuse of CCTV footage or any personal information.

By using bus and coach services which we operate passengers and employees will be deemed to have agreed to the terms and conditions of this policy.

Purpose

This policy sets out details of how Ritchies (the Company) will collect, use and store CCTV footage and images. It is designed to help ensure individual privacy is protected and to comply with our legal obligations under the Privacy Act 2020.

Scope

The policy applies to employees of the Company, to contractors, passengers and the general public, including suppliers or visitors to our sites.

Policy status

The Company reserves the right to amend all or part of this policy by publication to our Ritchies Transport website.

Any questions or suggestions should be addressed to the Privacy Officer in writing to in the first instance by writing c/o PO Box 95085, Swanson, Auckland or by email to communications@ritchies.co.nz.

Updates to this policy document				
Version	Action	Author	Approver	Date
GEN 1.0	Refreshed policy	Privacy Officer	CEO	23 August
<i>Next review due: August 2024</i>				

Policy detail

Our use of Closed-Circuit Television

In accordance with some customer contractual requirements and for reasons of safety, Ritchies operates video surveillance on its bus and coach fleet. We may also operate overt video cameras in areas where criminal activity and/or actions detrimental to health and safety could occur.

- The cameras record vision and audio and are capable of capturing night and daytime imagery.
- Where audio is recorded it will generally be in the proximity of the bus driver.
- Cameras should be mounted to ensure they are visible and identifiable as a camera
- Signage will be displayed on all public buses advising passengers of the presence of CCTV cameras.
- A copy of Ritchies CCTV policy will be available on the company website.

CCTV recordings are generally not viewed 'live' by our teams or as they are recorded. They are mainly reviewed later but only where that is relevant or required. Most footage captured by CCTV will never be viewed and will be recorded over as time passes.

CCTV footage use

Images from any camera system may be used by Ritchies in disciplinary processes, health and safety investigations, to defend against a personal grievance or other court action against Ritchies.

- Footage may assist where we investigate complaints from a passenger or member of the public;
- Recordings may be provided to the Police or other law enforcement agencies for the purposes of possible criminal investigations, or used in court or tribunal proceedings
- Camera systems may operate for the purpose of monitoring the behaviour of the public in areas where employees undertake their duties (e.g., car parks, reception areas).

Access and storage

Images will be stored for a minimum of 14 days but may be retained for longer periods for the purposes described above. After that time, the data is overwritten as part of the recording process, unless it is exported for evidential purposes as may be required.

- Stored video images will only be accessible to those persons approved by the Ritchies Privacy Officer or by Ritchies employees who are required to view the CCTV footage in order to carry out their duties. These roles include but are not limited to: the CEO, National Health and Safety Manager, national or branch depot managers or their delegates.
- Images of employees will only be released to third parties in accordance with the Privacy Act 2020.
- Under the Privacy Act individuals have a right of access to information about themselves held by an agency, including CCTV footage of themselves.
- Where a member of the public or passenger requests to be able to view CCTV footage of themselves this will be assessed in relation to the ability to readily retrieve the images and maintain the privacy of other identifiable individuals in the footage. The more sensitive the setting, the higher the risk of a privacy breach.
- We may need to protect the identity of others that are shown in the requested footage and video editing costs incurred may be passed onto the requestor. The prior authorisation of the Privacy Officer will be required in respect of the release of footage.

A request by a member of the public to view footage that contains information relating to other individuals must be in writing and will be dealt with as either a matter to be referred to police or a request under the Official Information Act, where it relates to a service operated on behalf of a local authority subject to the provisions of the act. If a request to view the footage is unable to be granted without unreasonably breaching others' privacy, a written description may be provided.

Responsibility for the CCTV systems

The following roles are responsible for the CCTV system in operation on Ritchies operated services: the National Fleet Manager, National Health and Safety Manager, relevant depot or operational managers in each region. They will oversee the daily operation of the system or be a point of contact for any faults or issues with the system.