



SUNLANDS PRIMARY SCHOOL

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CLOSED CIRCUIT TELEVISION POLICY (CCTV)

1. Introduction

This document is the Policy on Closed-Circuit Television of Sunlands Primary School, as approved by the School Governing Body. The policy has been drafted in accordance with the applicable provisions of the Constitution of the Republic of South Africa, 1996; the South African Schools Act 84 of 1996 ("SASA"), the Regulations for Safety Measures at Public Schools (Government Gazette 22754/2001: Government Notice 1040), and other applicable legislation.

In terms of the Regulations for Safety Measures at Public Schools, Sunlands Primary School has been declared a violence and drug-free school. The Policy on Closed-Circuit Television is aimed at giving practical effect to this declaration and to safeguard the school's staff, learners and visitors' well-being. The policy has been drafted in order to create the healthy school atmosphere that is essential for excellent education. Therefore, the policy intends for the closed-circuit television system to be managed so as not to infringe on the rights of the school's learners, staff, parents or visitors. The policy may also be reviewed from time to time, if the need arises.

In terms of section 20(1) (g) of SASA, the governing body must administer and control school property, including the buildings and grounds occupied by the school. Administer and control also includes introducing or installing security measures such as a closed-circuit television system. In addition, paragraph 5(1)(a) of the Regulations for Safety Measures at Public Schools provides that the principal – subject to the Constitution, other legislation as well as national and provincial policy – may take such steps as (s)he considers necessary for the safeguarding of the public school premises as well as for the protection of the people thereon. Paragraph 9(5) of the Regulations also stipulates that public schools must develop action plans to counter threats of violence that may have a negative impact on the school.

2. Definitions

'Public school premises' include any building, structure, hall, room, office, recreational area, land or enclosed area that is under the control of the school and to which a member of the public enjoys a right of access, or is usually admitted or may be admitted.

The principal acting on behalf of the school and on the authority of the governing body will implement measures to safeguard the premises as well as for the protection of the people thereon.

Other terms appearing in this policy shall be interpreted in accordance with the meaning assigned to them in SASA.

3. Aim of the policy

- 3.1. The aim of the policy is to regulate the use of closed-circuit television in monitoring the public school premises.
- 3.2. The cameras are primarily installed to combat or prevent any form of undesirable or undisciplined conduct as far as possible, thereby optimising the quality of life of all persons on the premises of Sunlands Primary School, as no form of threat against any person, persons or property will be allowed on the premises under any circumstances.
- 3.3. In addition to the above, the policy further aims to:
 - Prevent any form of harassment against any person (or persons), or investigate such harassment in a meaningful way with a view to prompt sensible action against any transgressor(s);
 - Prevent any form of undesirable and/or public misconduct, or investigate such misconduct in a meaningful way with a view to action against any transgressor(s);
 - Enable the principal or vice-principal or any duly authorised or delegated person to act or assist as swiftly as possible upon observing any form of undisciplined and/or undesirable and/or harassing conduct, or any other potential emergencies.

4. Application

This policy applies to all staff members, learners and parents of, as well as visitors to Sunlands Primary School. Any person who enters the public school premises agrees to abide by the policy.

5. Camera management and control

- 5.1. The cameras will be managed by the principal/vice-principal and the school's administrators, in consultation and collaboration with the School Governing Body.
- 5.2. The principal/vice-principal and the school' administrators will have direct control over the cameras.
- 5.3. The cameras, collected footage and copyright of any footage will remain school property at all times.
- 5.4. Any incident noticed on camera footage by the principal/vice-principal administrators or that *prima facie* points to criminal conduct will be reported to the South African Police Service or any other appropriate law enforcement institution for possible further investigation.

- 5.5. The cameras will be utilised in a way that respects the privacy of every affected person as far as possible.
- 5.6. The cameras will be permanently operational as far as possible.
- 5.7. The school will introduce a proper maintenance programme for the cameras as far as practicable.
- 5.8. The monitoring of the premises will occur in a professional, ethical and legal way, and for no purpose other than in terms of this policy.
- 5.9. The cameras may not be utilised to discriminate against any person based on, among others, race, gender, sexual orientation and disability in any possible way.

6. Camera operating system

- 6.1. The closed-circuit television system has been installed in strategic locations on the school premises.
- 6.2. The camera control centre is in the office of Ms Puccini, the principal's PA.
- 6.3. Said cameras will as far as possible record footage 24 hours per day.
- 6.4. According to the supplier of the cameras, said footage may be stored for a limited period only. This will depend on the software installed.
- 6.5. Should such a need exist or arise, footage may also be stored in additional ways, such as on a central hard drive or compact disc (CD).

7. Location of cameras

Cameras will not be installed in any area where any person may reasonably insist on a measure of privacy. In cloakrooms, cameras will not face toilets or urinals. Cameras have been positioned so as to monitor outside areas, the school entrances, passages, *entrances* to classrooms, offices, toilets, bursars' office and staff room.

8. Notices

Notices declaring that the school makes use of closed-circuit television will be displayed in the following areas:

- At the entrances of the school
- Along the outside of the main building

9. Access to data

Access to and inspection of footage recorded by the cameras will be dealt with as follows:

- 9.1. Subject to the provisions below, collected footage will be made available only to persons or institutions whose interests or rights are or may be directly affected by it.
- 9.2. No person or institution other than those mentioned in paragraph 9.2.1 will receive access to or permission to inspect the footage.
 - 9.2.1. Persons or institutions may apply in writing to the principal, vice-principal or SGB chairperson for permission to inspect the footage, which persons or institutions must specifically include the following in their written “requests”:
 - a) Full personal information
 - b) A full motivation, consisting of a brief and concise explanation of the reason(s) why any recorded footage needs to be inspected, specifically also mentioning and describing any possible incident(s) in respect of which footage is to be inspected
 - c) Which rights or interests would be protected.
- 9.3 The principal or, alternatively, the vice-principal will consider the aforementioned request in consultation with the SGB chairperson or, should the SGB chairperson be unavailable, in consultation with the SGB vice-chairperson. This will occur with due regard to the principles in this policy and/or any other policy that may possibly relate to the request.
- 9.4 If the aforementioned request is approved, the applicant(s) to whom such permission is granted may view the relevant footage only during school hours in the office of the vice-principal, and only in the presence of the vice-principal and such other person who, in the vice-principal’s opinion, may have an interest in the proceedings, unless the applicant(s) and the vice-principal agree otherwise in writing.
- 9.5 Any persons who obtain or attempt to obtain access to recorded footage in contravention of this document, or who publish or attempt to publish any recorded footage, or who interfere or tamper with the cameras without the knowledge of the principal or vice-principal, will render themselves liable to disciplinary action and/or criminal and/or civil prosecution.
- 9.6 A proper record will be kept of all requests for access to footage received by the school.
- 9.7 Any recorded footage will be allowed as evidence against any person during any proceedings in the school context, with no proof of authenticity required. In other words, any recorded footage will be what it claims to be.

10. Unlawful use

Any person who believes that the system is used for any purpose other than in terms of this policy may lodge an official complaint with the principal or SGB.

