

128 CCTV Installation and Management Policy

Purpose

1. This policy outlines the requirements relating to the design, installation and responsible management and use of closed-circuit television (CCTV) systems. CCG/ECG operates its CCTV systems in accordance with this policy.

Scope

2. Community College Gippsland and ECG Secondary College, to be known as CCG for the purpose of this policy.

Details

Installation of CCTV Systems

- 3. The installation and use of CCTV systems within CCG can support and enhance the ability to provide a safe and secure college environment for students, staff, and visitors. CCG must ensure that privacy is considered in the installation and use of CCTV systems.
- 4. Installing CCTV systems on school grounds can support CCG by:
 - acting as a deterrent and reducing the likelihood of vandalism, theft, misconduct, and inappropriate behaviour.
 - helping to verify incidents on college grounds to support an evidence-based response.
 - reassuring students, staff, and visitors that they are protected when on college grounds.

Consultation

5. Before deciding to install a CCTV system, the CEO will consult with and consider the views of the board. The CEO may also wish to extend consultation to other members of the College community including staff, students, and parents.

Decision to Install

- 6. The final decision to install a CCTV system rests with the CEO.
- 7. The College will inform the school community of the intention to install a CCTV through appropriate channels such as a:
 - newsletter article
 - statement on the school website
 - posted material within the school grounds.

Prohibited Locations of CCTV Cameras

8. Schools must not install CCTV cameras in the following areas:

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- toilets
- change rooms
- dressing rooms
- showers
- other areas where individual privacy is paramount.

Covert Surveillance

9. CCG does not undertake covert (or hidden) surveillance using CCTV systems.

Signage

10. CCG will install appropriate signage that notifies staff, students, visitors, contractors and/or the general community that CCTV is in operation.

CCTV Privacy Notice

- 11. In addition to signage, CCG has a CCTV privacy notice on its website, which:
 - explains the purpose of the CCTV system.
 - provides the location of CCTV cameras.
 - explains how to request a record of any footage.
 - provides a link to this policy for further information on how the College may use the CCTV system and who may access the footage.

Management and Operation of CCTV

- 12. The CEO is responsible for ensuring the CCTV system is managed and operated in accordance with this policy and for keeping a record of the staff members nominated to access the system.
- 13. All CCG staff with responsibility for using and managing the CCTV systems must be:
 - appropriately trained in using and managing the CCTV system and made aware of the requirements contained in this policy.
 - made aware that their access to live and recorded footage may be subject to review.

Access to CCTV Footage

- 14. CCTV footage must only be accessed for the purposes set out in this policy (refer to 'Use of CCTV footage' below) and only by the following people:
 - The CEO and staff nominated by the CEO.
 - any other people permitted or required by law.
- 15. CCG must record each occasion CCTV footage is accessed in the CCTV recorded and viewed footage register.

Live CCTV Footage

16. Live CCTV footage may be used by college staff to:

- provide situational awareness of incidents that pose a risk to health or safety of the College community or following a college security alarm activation or other trigger.
- monitor for activities that pose a risk to the health or safety of the College community or to property where:

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- there is a reasonable belief that an incident will occur.
- monitoring the CCTV live footage will help to identify the persons involved and/or support the College to reduce the risk of the incident occurring or reoccurring.

Recorded CCTV Footage

17. Recorded CCTV footage may be used by college staff to:

- prevent, verify, and investigate incidents involving:
 - criminal behaviour of anyone on school grounds
 - staff misconduct
 - other inappropriate behaviour including of students, staff, visitors, or members of the public.
 - Other incidents involving students, staff, or visitors.
- support CCG leadership with incident review and debriefing.

Prohibited Uses

- 18. In addition to the prohibited locations of CCTV cameras above, CCTV footage must not be used by CCG:
 - to monitor non-school facilities or public places
 - to monitor staff performance
 - for the purpose of covert surveillance except in accordance with this policy refer to the heading 'Covert surveillance' above.

Disclosure of CCTV Footage to External Parties

- 19. Live or recorded CCTV footage may only be disclosed externally as described in this policy or otherwise when permitted or required by law.
- 20. Examples of when CCTV footage may be disclosed externally include:
 - live or recorded footage disclosed to law enforcement agencies where required or permitted by law.
 - when required under a court order.
- 21. CCG may contact ISVs School Services advisory contact for advice when they receive a request from an external party for access to live CCTV footage or for copies of recorded CCTV footage to help determine if the footage can be shared with the party or if they need to be referred to the department's Freedom of Information Unit.

Showing Footage to Students, their Parents and Staff Involved in Incidents

- 22. When using CCTV for the purposes listed in this policy under the heading 'Use of CCTV', the CEO or authorised delegate may show specific footage of an incident to those directly involved, including relevant staff, students and/or their parents, provided:
 - it is deemed appropriate and necessary to support parents to understand the specifics of an incident that has taken place so they can provide appropriate support to their child or for a staff member to better understand an incident.
 - it would not cause a health, wellbeing, or safety risk to any other person and
 - it would not be an unreasonable intrusion into another person's privacy.

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23. CCG may contact the ISV School Services Advisor for further advice on when it may be appropriate and lawful to show students, parents, or staff CCTV footage.

Recorded Material - Storage and Retention

- 24. The CEO, or authorised delegate is responsible for ensuring CCTV recorded images are stored securely and retained for the required period.
- 25. CCTV footage must be securely retained for a minimum of 31 days.
- 26. If the CCTV footage has not been accessed or used in the ways set out above and there has been no request to view or otherwise access the footage, the footage may be deleted after 31 days.
- 27. Where the CCTV footage has been accessed or there has been a request to access, CCG must manage their records in accordance with the CCG Records Management Policy.

Maintenance of CCTV Systems

28. CCG will regularly check that the CCTV recording equipment is checked on an annual basis by an approved contractor to ensure the system is maintained in good working order.

Complaints

- 29. Parent complaints relating to CCTV systems should be managed in accordance with the CCG parent complaint policy and procedures.
- 30. Complaints from other members of the community can be managed by the school, with support and advice from the ISV School Services Advisor.

Definitions

- 31. **CCTV footage:** Closed-circuit television (CCTV) refers to broadcasts transmitted to a limited number of closed monitor/s for the purpose of video surveillance. The video is often recorded for set periods of time and the footage used for evidence.
- 32. Situational awareness: The state of knowing what has occurred and what is currently happening in an incident or emergency based on the best available knowledge, information, and data.

Relationships

- 102 Records Management Policy
- 102-1 Records Management Procedure
- 103-1 Staff Complaints procedure
- 103-2 Student Complaints Procedure
- 131 Information Privacy Policy

Relevant Legislation

• Privacy and Data Protection Act 2014 (Vic)

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