



# DIOCESE OF SALE CATHOLIC EDUCATION LTD.

## CLOSED CIRCUIT TELEVISION POLICY

### 1.0 INTRODUCTION

The Diocese of Sale Catholic Education Limited (**DOSCEL**) and the primary and secondary Catholic schools it owns and operates in the Diocese of Sale in the State of Victoria (**Schools**) are committed to providing safe environments for all employees, students and visitors. Closed Circuit Television (**CCTV**) is an effective crime prevention tool that can assist with improving risk management controls and personal safety.

DOSCEL and its schools recognise the need to ensure a balance between the individual's rights to be free from invasion of privacy and the duty to promote a safe environment for all employees, students and visitors, and the protection of property.

### 2.0 PURPOSE

The purpose of this policy is to enhance the security of property owned and operated by DOSCEL and its Schools and provide all employees, students and visitors with a safe environment in which they can work and study.

The use of CCTV by DOSCEL and its Schools assists with detecting and deterring vandalism, unauthorised entry into buildings, theft, other unwanted activities and monitoring emergency situations, should they occur.

### 3.0 DEFINITIONS

**Closed Circuit Television (CCTV):** A surveillance system in which a number of cameras are connected through a closed circuit. The footage taken by the cameras is sent to a television monitor or recorder. CCTV systems consist of cameras, monitors, recorders, interconnecting hardware and support infrastructure.

**Server:** A computer or computer program, which manages access to a centralised resource or service in a network.

## 4.0 PROCEDURES

### 4.1 CCTV Camera Installation

Prior to selecting, installing or maintaining CCTV equipment on School premises, consultation and prior approval of the Chief Financial Officer, Diocese of Sale Catholic Education Limited (**Chief Financial Officer**) must be sought to ensure a maximum benefit is attained.

A plan outlining proposed CCTV camera placement and locations must be completed by the Principal when requesting approval from the Chief Financial Officer to install CCTV Systems on school premises.

DOSCEL will consult with Principals on the location and utility of the CCTV cameras and storage mediums.

CCTV installations in Schools must comply with legislative and DOSCEL requirements. This Policy has been established to ensure that any School planning to install CCTV surveillance meets these requirements.

Following approval of the installation by DOSCEL, employees and the School community including parents/guardians and students must be notified prior to installation.

### 4.2 CCTV Camera Use

CCTV operates using cameras to transmit a video image to a specific set of monitors and secondary devices, including external security monitoring centres.

Employees must not access footage from CCTV cameras on mobile phones, iPads, tablets, laptops or other portable electronic devices.

Access to CCTV footage is limited to authorised employees and authorised Police or Security Personnel with a legitimate reason to view/or otherwise use the captured footage for one of the following security purposes:

- to prevent, deter and detect any theft or damage to property
- to prevent, deter and detect serious breaches of DOSCEL and/or School expectations
- the collection of information on any incident that breaches DOSCEL and/or School expectations.

The Catholic Education Office, Diocese of Sale (CEOSale) and each School that has CCTV cameras installed will have clearly identified warning signs with the message: 'Security Notice – electronic surveillance protects this property'.



### **4.3 Prohibited Use**

CCTV cameras must not be used in the following prohibited areas during the course of normal School hours:

- in private locations such as toilets, showers or change rooms
- in first aid rooms, sick bays or staff rooms
- in classrooms.

CCTV cameras must not be used to monitor students or work performance of staff.

Hidden or covert CCTV cameras are strictly prohibited.

Audio recording devices are strictly prohibited.

### **4.4 Ongoing Management Responsibility**

DOSCEL has the responsibility for the ongoing management of the CCTV system located at CEOSale.

Principals will have the responsibility for the ongoing management of the CCTV system within the School. Principals may delegate this responsibility with written approval from the Chief Financial Officer.

With support and guidance from DOSCEL, Principals or an approved nominated staff member will be responsible for:

- controlling the operation of the CCTV system to ensure that it is within the requirements of government legislation and DOSCEL Policies and Procedures
- ensuring CCTV cameras are not installed in prohibited locations
- ensuring that clearly identifiable warning signs with the message: 'Security Notice – electronic surveillance protects this property' are installed at the School
- supporting the maintenance and upgrade of CCTV cameras when necessary.

### **4.5 Operating Requirements**

Requests to access CCTV footage located at a school premises must be approved by the Principal. Principals may delegate this responsibility with written approval from the Chief Financial Officer.

Requests to access CCTV footage located at CEOSale must be approved by the Chief Financial Officer.

All employees involved in the operation of the CCTV system are expected to exercise care to ensure appropriate viewing of CCTV footage and to prevent improper disclosure of the recorded material.

CCTV surveillance images and footage are only to be viewed, by authorised personnel, if there is a reasonable belief that an incident has occurred and that the surveillance data may assist in identifying what had occurred and who may be involved.

The request for access to CCTV footage will include the following information:

- date of the incident
- time of the incident
- location of the incident
- reason why the viewing has been requested
- the names of those involved (if applicable).

All employees must be briefed on these requirements.

Principals are required to maintain a register of who has accessed the School surveillance images and when. DOSCEL is responsible for the maintenance of a register for CEOSale.

Each register must be stored in a secure location and be made available to DOSCEL on request.

#### **4.6 Access to and Disclosure of Images to Third Parties**

All employees must be made aware of the restrictions set out in this policy in relation to access and disclosure of recorded images.

Disclosure of the recorded images to third parties should be limited to the following classes of persons/agencies:

- law enforcement agencies such as Victoria Police, where the images recorded would assist a specific enquiry or investigation
- law enforcement agencies where the images would assist a specific criminal enquiry
- relevant legal representatives.

A register is to be kept of who has accessed the surveillance images and when.

Principals should seek guidance from the Chief Financial Officer in relation to the release of footage to third parties.

#### **4.7 Storage of CCTV Footage**

CCTV footage is to be kept for a minimum of 60 days.

When CCTV footage is used to investigate and document specific or significant incidents, including an incident or alleged incident of child sexual abuse, the footage must not be destroyed and must be stored in a secure location indefinitely.

If no request has been made to view or access CCTV footage and no specific or significant incidents have taken place, the stored data can be overwritten after a minimum of 60 days.

CCTV footage is to be stored on a designated secure server.

Access to the footage must be restricted to network administrators only.

#### **4.8 Reporting Criminal Damage**

Criminal activities, including vandalism, threats of assault, arson and burglary, are to be reported without delay to the Police and to the Chief Financial Officer.

This information is used to implement security initiatives and other strategies to assist Schools.

#### **4.9 Managing Concerns and Complaints**

Complaints about the School's CCTV system should be managed in accordance with the processes outlined in the School's Complaint Handling Policy and the *Resolving Parent/Guardian Issues and Concerns: Management of Complaints and Grievances Policy*.

DOSCEL can provide advice and support to Schools when they are responding to complaints in relation the CCTV system.

If a person is not satisfied that their complaint has been resolved by the School, or if their complaint is about the Principal of the School, they may refer their complaint to DOSCEL.

Complaints about DOSCEL CCTV systems should be made in writing to the Director, Diocese of Sale Catholic Education Limited.

## **5.0 EXPECTED OUTCOMES**

The personal information contained on the recordings shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law.

The installation of a CCTV system is expected to enhance the security of property owned and operated by DOSCEL and its Schools and provide all employees, students and visitors with a safe environment in which they can work and study.

## **6.0 REFERENCES**

- [Creating, Managing and Retaining Records for Current or Future Child Sexual Abuse Allegations Public Record Office Victoria](#)
- [Victorian Ombudsman's Guidelines for developing Closed Circuit Television policies for Victorian Public Sector Bodies \(November 2012\)](#)

## 7.0 LEGISLATION

Various Acts affect the use of CCTV, including:

- *Surveillance Devices Act 1999*
- *Public Records Act 1973*
- *Privacy and Data Protection Act 2014*
- *Private Security Act 2004*
- *Charter of Human Rights and Responsibilities Act 2006*
- *Freedom of Information Act 1982*
- *Evidence Act 2008*

## 8.0 RELATED POLICIES

- [DOSCEL Privacy Policy and Standard Collection Notice](#)
- [Resolving Parent/Guardian Issues and Concerns: Management of Complaints and Grievances](#)

## 9.0 REVIEW

**Implementation Date:** August 2019

**Review Date:** August 2020